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# APPLICATION FOR A CERTIFICATE OF APPROVAL

FOR THE

STATE ROAD 32 RECONSTRUCTION PROJECT  
(DES. NO. 1801731; DHPA NO. 23531)

MARCH 5, 2021



**INSTRUCTIONS FOR  
APPLICATION FOR A CERTIFICATE OF APPROVAL**  
Part of State Form 52889 (R2 / 8-19)

## BACKGROUND

Indiana Code § 14-21-1-18(a) and (b) require that a certificate of approval be obtained before using state funds to alter, demolish, or remove an historic site or historic structure, if it is owned by the state or if it is listed in either the Indiana Register of Historic Sites and Structures or the National Register of Historic Places. The application must be submitted to the Department of Natural Resources, Division of Historic Preservation and Archaeology (“DHPA”), and heard by the Historic Preservation Review Board (“Review Board”).

A state administrative rule regarding the certificate of approval process, 312 IAC 20-3-3, took effect on December 1, 2003. The rule requires that a completed application for a certificate of approval be filed with DHPA at least forty (40) days prior to the Review Board meeting at which the application is to be considered. The rule also requires that the application be submitted on a form to be provided by DHPA. This is the form to be used for the application.

## DETERMINING WHETHER A CERTIFICATE OF APPROVAL IS REQUIRED

If the state agency or its applicant for funding is not certain whether or not the project will alter, demolish, or remove a site or structure that is historic, then the state agency or applicant may ask for DHPA’s technical advice on the historical, architectural, or archaeological significance of sites or structures, or on the project’s impact on them, before applying formally for a certificate of approval. Depending on the nature of the project and the properties it could impact, the Director of DHPA or the DHPA staff may recommend that additional information be provided for the benefit of the Review Board, such as the report of an archaeological investigation of an undisturbed parcel of land, a structural report on a structure proposed for demolition, or photographs of work areas and detailed plans and specifications of proposed rehabilitation work.

Consequently, it would be advisable for the applicant to consult informally with the DHPA staff well before the forty (40) day deadline for filing the application for a certificate of approval, so that the staff could advise the applicant whether any of those additional items will be needed prior to the Review Board meeting. Similarly, the DHPA staff informally can advise the applicant of any other, obvious information deficiencies or of questions that the Review Board likely would want to have answered before the Review Board meeting.

## COMPLETING AND FILING THE APPLICATION FORM

Once it is determined that an historic site or historic structure will be altered, demolished, or removed and that a certificate of approval will have to be obtained, please complete the form below. Attempt to respond to the numbered items below *on the application form*. If you have an electronic copy of this form, you may enlarge the space provided between questions in order to accommodate your written response. If any of the requested information will not fit into the space provided then you may attach additional sheets and indicate where that information may be found (e.g., “Continued on attached sheet” or “See response on page 1 of the attachment” or “Photographs attached”). Please note that Question 4 is requesting detailed information on the proposed work for the project (scope of work). A clear description of the scope of work will greatly assist the review process. If any requested item of information is inapplicable, then please explain.

**Please file one (1) copy of the application form and of any attachments to the DHPA at least forty (40) days prior to the meeting at which you wish to have the application considered by the Review Board.** You will be notified by DHPA staff if an additional eleven (11) copies are needed for Review Board consideration. To be deemed filed, the application must be received at the DHPA office no later than

4:45 PM on the day that is forty (40) days prior to the date of the meeting. The Review Board typically meets on a Wednesday in the last half of January, April, July, and October. You may check with DHPA staff or visit the DHPA website to ascertain the date of the next meeting and the date on which the forty (40) day deadline falls.

#### BEFORE THE REVIEW BOARD MEETING

The agenda, staff comments, and applications for certificates of approval are mailed to Review Board members about two (2) weeks prior to the next Review Board meeting. The applicant's principal contact person will receive a copy of the staff comments after they have been prepared for the Review Board members and prior to the meeting. To save on postage and copying costs, the DHPA staff prefers to send the agenda and staff comments by e-mail, so please provide an e-mail address for the principal contact person on the project.

The principal contact person and/or another representative of the certificate of approval applicant who is knowledgeable about the details of the project should plan to attend the Review Board meeting. Typically, an applicant is given a few minutes to explain the project or to highlight key points, and the Review Board members often ask questions about the application.

#### EXPIRATION DATE

By board policy, a certificate of approval granted by the Indiana Historic Preservation Review Board shall be in effect for two (2) years from the date of issuance, unless otherwise specified. An applicant that requests an extension to a certificate of approval *prior to* its expiration, is automatically granted a temporary extension until such time as the board may act upon the request to approve or deny further extensions of time.

#### MAILING OR DELIVERY ADDRESS FOR THE APPLICATION

Indiana Department of Natural Resources  
Division of Historic Preservation and Archaeology  
402 West Washington Street, Room W274  
Indianapolis, Indiana 46204-2739

#### FOR MORE INFORMATION

Questions about issues pertaining to structures should be directed to the Historic Structures Review Section of DHPA. Questions about archaeological matters should be directed to the Archaeology Section. Either section may be contacted at 317-232-1646 or at [dhpa@dnr.in.gov](mailto:dhpa@dnr.in.gov).



## APPLICATION FOR A CERTIFICATE OF APPROVAL

State Form 52889 (R2/ 8-19)  
DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF HISTORIC PRESERVATION AND ARCHAEOLOGY

*Please provide the information requested in the numbered items below, or explain why it is inapplicable. Please attach additional sheets as needed for complete explanation.*

Date (month, day, year): March 5, 2021

- ☒ This is a new submittal.
- ☒ This is revised/additional information relating to DHPA number 23531 .
- ☐ This project will also be applying for Federal Rehabilitation Investment Tax Credit.
- ☐ This project will also include federal involvement and will therefore be undergoing a Section 106 review.

- 1) Identify the state agency that will be spending or providing the funds and if applicable the entity (local government, not-for-profit organization, etc.) that is applying for or that has received the state funds. Also, if applicable, indicate which grant program is being utilized.

The project will receive a combination of state and local funding. The state funding is from the Indiana Department of Transportation (INDOT). The City of Westfield is the applicant and the source of local funding. Information about the project may be found on the City of Westfield website at: <https://www.westfield.in.gov/topic/index.php?topicid=46&structureid=261>.

Please note that previously, the City of Westfield and INDOT anticipated federal funding from the Federal Highway Administration (FHWA), which required the project to follow the Section 106 process of the National Historic Preservation Act (NHPA). As part of Section 106, two meetings have occurred with consulting parties. The Section 106 process ended just prior to the issuance of the FHWA's signed Finding of Area of Potential Effect, Eligibility, and Effects. INDOT issued a State Finding of Area of Potential Effect, Eligibility, and Effects on December 31, 2021. Since that time, two interested party meetings have occurred to discuss the project and potential mitigation.

- 2) Provide the name, mailing address, telephone number, and e-mail address of the principal contact person for this application. The principal contact person may be an official or an employee of the state agency, applicant, or the applicant's consultant or other agent.

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- 3) As applicable, provide the address, and the nearest city or town, township, and county of the proposed project area.



The proposed undertaking is located in Westfield along State Road (SR) 32/Main Street roughly extending from Poplar Street east to Timberbrook Run and from Jersey Street north to Penn Street in Hamilton County, Indiana. It is within the Washington Township, Westfield and Noblesville United State Geological Survey (USGS) 7.5 Minute Quadrangle Map in Section 36, Township 19 North, Range 3 East; Section 31, Township 19, Range 4 East; Section 1 Township 18 North, Range 3 East; and Section 6, Township 18 North, Range 4 East.

See Attachment A. Project Maps & Attachment B. List of Properties.

- 4) Provide a detailed description of all construction, demolition, landscaping, earthmoving, rehabilitation, and installation activities proposed as part of this project (i.e., scope of work). This needs to include as much detail as possible at the time of submission. If you have copies of estimates or descriptions of proposed work from contractors those can be attached. If replacement of historic materials/features is proposed then documentation of the current condition justifying the need for replacement along with information on proposed replacement materials/items must be provided.

The project will widen SR 32/Main Street through the City of Westfield in order to alleviate traffic congestion. The project will occur north of the Indiana Register of Historic Sites and Structures (State Register)-listed **Stultz-Stanley House** and will bisect the National Register of Historic Places (National Register)-listed **Westfield Historic District**.

#### **Purpose and Need:**

The purpose of the proposed project is to improve corridor mobility along SR 32/Main Street through the downtown Westfield area for both motorists and pedestrians. The existing corridor does not provide a safe traveling environment for motorists or pedestrians, as the existing roadway is congested.

The need for the project is due to extensive queuing on SR 32/Main Street both east and west of Union Street. Traffic flow is impeded at the numerous drives and intersecting roads along the corridor. In particular, the Poplar Street/Shamrock Boulevard roundabout is negatively impacted when slowed or stopped vehicles on SR 32/Main Street back up into the roundabout and prevent other vehicles from entering the roundabout. This restricts access from other directions trying to reach the north leg of the roundabout that leads to Riverview Health Hospital and the Westfield Intermediate and Middle Schools. Due to projected growth in the community, as well as planned developments in the area, the existing traffic congestion is expected to increase in the future.

See Attachment E. Alternative Analysis for further details concerning the purpose and need of the project, as well as the existing and future traffic conditions.

#### **Description of the Preferred Alternative:**

The preferred alternative (Alternative A) involves widening and reconstructing SR 32 from just east of the Poplar Street roundabout to just east of Timberbrook Run. Outside of the boundaries of the Stultz-Stanley House and the Westfield Historic District, the existing 2-lane section of SR 32 will be reconstructed to consist of four, 11-to-12-foot wide travel lanes (two westbound, two eastbound), with a raised 13-foot wide center median, curb and gutter, and 8-foot wide sidewalks separated by 6-foot wide grass buffers on both sides of the roadway. At the intersection of SR 32 with Westlea Drive/Mill Street, the raised median will transition to an 10-foot wide protected left turn lane for eastbound traffic to access Westlea Drive to the north.

A 12-foot wide dedicated right turn lane will be provided for eastbound traffic to access Mill Street. Along SR 32 left turns will be restricted to Westlea Drive/Mill Street and Union Street. This reconstruction will result in widening the roadway to the south by approximately 25 feet. Along SR 32 between Walnut Street and Cherry Street, a crosswalk with a pedestrian refuge island is proposed to provide an alternative crossing option for pedestrians between Union Street and East Street.

Throughout the project area the existing overhead utilities along the south side of SR 32 will be moved underground beneath the new sidewalk. The existing overhead utilities consist of electrical transmission and distribution cables in addition to multiple communications cables and their associated wooden power poles. Each of the utilities will require adequate separation from each other so maintenance and repairs can occur when necessary. Typical minimum separation is 3 to 5 feet, depending on individual utility requirements. In addition to requiring enough room to relocate facilities within the right of way, a minimum of 10-foot-by-10-foot wide areas will be required as a dedicated easement for above ground pad-mounted equipment. Due to the area needed for utility relocation, an anticipated utility corridor that is 15-feet wide extending from the curb line is accounted for along the south side of SR 32.

In front of the **Stultz-Stanley House**, SR 32 will be shifted north by approximately 34 feet to minimize impacts, and

the typical section of SR 32 will remain the same with the exception of no 6-foot wide grass buffer along the south side of the roadway between the sidewalk and roadway. Although the roadway will be shifted north, some widening will be required to the south. As a result, the sidewalk will conflict with the existing stairs and front yard of the Stultz-Stanley House. Due to a significant difference in elevation between the yard in front of the Stultz-Stanley House and the existing roadway, a retaining wall will be constructed in front of the house to stabilize the current yard and to avoid compromising the structure. Due to the area needed to provide the 15-foot wide utility corridor, the top of the stairs and the closest edge of the retaining wall will be approximately 7-feet from the edge of the front porch steps to the house. The rest of the retaining wall will be approximately 18-feet from the edge of the front porch.

Within the boundaries of the **Westfield Historic District**, SR 32 will be reconstructed to consist of four, 11-to-12-foot wide travel lanes, an 11-foot wide turn lane, a 2-foot wide raised center curb with 1-foot wide curb offset, curb and gutter, and 8-foot wide sidewalks separated by 6-foot wide buffers on both sides of the roadway. This will result in widening SR 32 to the south by approximately 25 feet and result in the removal of four buildings from the Westfield Historic District: 101 S. Union Street, 102 S. Union Street, 103 S. Union Street and 111 E. Main Street. This widening will bisect the Westfield Historic district.

Moving east outside of the district, the intersection of SR 32 and East Street will be reconstructed to a roundabout with four, 11-to-12-foot wide travel lanes (two westbound, two eastbound) with 8-foot wide sidewalks separated by 6-foot wide grass buffers on all sides. This will provide an opportunity for U-turn movements at each end of the project area to compensate for the restricted left turns throughout the roadway corridor. Pedestrian crosswalks and refuge islands will be constructed at each leg of the roundabout. A curb cut will be provided for the anticipated connection of the southern leg of the roundabout to the proposed Jersey Street Extension. North of the roundabout, East Street will be reconstructed to consist of two 11-foot wide travel lanes (one northbound, one southbound) with 6-foot wide sidewalks adjacent to the curb and gutter on the west side of the roadway. East Street will be realigned to provide the appropriate transition into the roundabout as well as to straighten out the existing S-curve along East Street, north of Penn Street. East of the roundabout and extending to just east of Timberbrook Run, SR 32 will be reconstructed to consist of four 11-to-12-foot wide travel lanes (two westbound, two eastbound).

Please note there are several planned developments and improvement projects in downtown Westfield that are in various stages of planning and completion. One of the developments, Union Square at Grand Junction, is a private development along the south side of SR 32 between Union Street and Mill Street. Developers have purchased some of the properties within the area and are negotiating agreements to purchase the remaining properties. This development will impact buildings within the Westfield Historic District at the southwest corner of SR 32 and Union Street, which overlaps with anticipated impacts proposed as part of the SR 32 Reconstruction project.

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- 5) Provide a detailed explanation of how, and to what extent, land, buildings, structures, or objects, in or adjacent to the project area, could be physically altered or visually modified or obscured by the work being proposed as part of this project. This should include impacts to surrounding properties and not just the project site.

The preferred alternative would require the relocation of thirteen buildings (14 units) and 2.256 acres of right-of-way. It will acquire four buildings from the Westfield Historic District (0.28 acre) and 0.016 acre from the Stultz-Stanley House parcel.

Table 1 in Attachment C summarizes impacts within the project corridor. In addition, Attachment B includes a list of all adjacent properties and impacts. A narrative description of impacts is included in the discussion of the preferred alternative (Question 4).

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- 6) Describe the current and past land uses within the project area. In particular, state whether or not ground disturbance has occurred through construction, excavation, grading, or filling, and, if so, indicate the part(s) of the project area that have been disturbed. Explain the nature and depth of the disturbance. Be aware that agricultural tilling generally does not have a serious enough impact on archaeological sites to constitute a disturbance of the ground for this purpose.

Current Land Use:

The project area contains a mix of residential and commercial properties dating from the nineteenth century to circa 2010. Build dates for individual resources may be found in Attachment B.

Past Land Use & Disturbances:

Since the early nineteenth century, the project area has been associated with the community of Westfield. The intersection of SR 32/Main Street and Union Street is part of the original Westfield, Indiana plat. "West Field" was platted in 1834 and included 48 lots extending north and south from Main Street (SR 32) which, at 70-feet wide, was the largest street. Main Cross Street (Union Street) was the second widest road at sixty-six feet. Walnut and Cherry Streets were 33-feet wide, while the alleys were 12 feet (north-south) and sixteen and a half feet wide (east-west). By 1866, after the end of the Civil War, development extended in all directions from Westfield's original plat. A meat market, drug store, hotel, and several shops lined Main Street.

Westfield's streetscape evolved over the twentieth century. A series of fires in the late nineteenth century destroyed many buildings in the central part of the town but buildings like the Westfield Carnegie Library (IHSSI No.: 057-667-26024, within the Westfield Historic District), replaced earlier structures.

A circa 1890 photograph of Union Street depicts a dirt (or possibly gravel/stone) road with a curb, curb lawn, sidewalk, and timber utility poles. A photograph from the later 1900s of East Street near SR 32/Main Street shows fewer improvements – a dirt road with utilities and sidewalk but no curbs. In the 1930s, Union Street was paved as part of US 31. US 31 was re-routed west of Union Street between 1953 and 1956, according to historic topographic and aerial maps (See Historic Photos in Attachment D).

Disturbances for the SR 32/Main Street Westfield project area are generally from urban development, including existing roads, road construction, intersections, and road grading; sidewalks; utilities; the construction of structures, businesses, and houses; demolition areas where former historic houses were located; parking lots; driveways; and landscaping. At the west end of the project area, work at the Poplar Street intersection between 2012-2013 has resulted in the demolition of several buildings.

Nine resources within or adjacent to project activities have been demolished since the IHSSI survey in 1991. Those resources are described in Table 2 of Attachment C.

- 7) State the known or approximate dates of construction of structures (including buildings, bridges, monuments, picnic shelters, historic districts, etc.) and any other historical information known about the land and structures within the project area. For projects involving buildings or structures include the date of original construction along with the dates of any previous alterations/renovations. It may be necessary to consult county histories, the State Historic Architectural and Archaeological Research Database (SHAARD), the county historian, or a local historical or historic preservation organization for this information. The SHAARD database and user guide can be found on the DHPA website at [www.in.gov/dnr/historic](http://www.in.gov/dnr/historic).

A list of resources along the project and their dates of construction may be found in Attachment B.

The sidewalk, street lights, and other aboveground utilities are generally modern and date to late twentieth century or early twenty-first century.

#### **Westfield Historic District (NR-2521)**

Roughly bounded by Penn Street on the north, Walnut Street on the east, Park Street on the south, and Camilla Court on the west.

The Westfield Historic District consists of an even mix of historic commercial and residential buildings that extend out from the intersection of SR 32/Main Street and Union Street in Westfield. The town is laid out in a grid, with north-south and east-west streets intersecting at right angles. The district includes thirty-seven Contributing resources (thirty-six buildings and one structure) and fourteen Non-Contributing resources (thirteen buildings and one site). The period of significance ranges from circa 1850, the date of construction for the oldest building in the district, to 1968.

Resources within the district represent a variety of architectural types and styles that were popular during the period of significance. Commercial buildings are primarily parapet-front brick buildings and gable-front frame buildings. Most buildings stand one-story tall, although a few are two stories in height. Most commercial buildings, which primarily date from circa 1860 through the mid-twentieth century, are found along Union Street north and south of Main Street. A few of the brick buildings feature simple Italianate or Romanesque Revival-style details in their segmental-arched or round-arched window and door openings and bands of contrasting trim. Buildings of mid-twentieth-century vintage display simple, modern, and functional details common to mid-twentieth-century commercial architecture. Many storefronts have been altered to some degree with replacement windows and doors.

Residential resources are typically vernacular and include examples of central passage, gable-front, T-plan, gabled ell, and I-house types. These buildings, which stand one, one-and-one-half, and two stories tall, feature stylistic details common to architectural styles that were popular when they were constructed or, in some cases, remodeled. These styles include Greek Revival, Italianate, Queen Anne, Craftsman/Bungalow, and English Cottage.

Non-Contributing resources within the district include buildings that were constructed outside of the period of significance or that have been altered substantially from their historic appearance.

The district also includes one bridge as a Contributing resource south of the project: the bridge carrying Union Street over Grassy Branch Creek (Bridge No.: 29-00612/NBI No.: 2900214). This continuous, three-span reinforced concrete bridge was constructed in 1961 and reconstructed in 1997. It was determined not individually eligible for the National Register as part of the Indiana Historic Bridge Inventory.

The Westfield Historic District is significant under National Register Criterion A for Commerce and Criterion C for Architecture. The district was listed in the National Register in January 2019.

The nomination notes that "The Westfield Historic District, though small, has an array of architectural types and styles popular during the period of significance. In many cases, architectural types transcend use and include both residential and commercial buildings, such as gable-front structures, in the district. A few architectural styles also transcend building uses for both residential and commercial structures. There is no dominant architectural type or style; in most cases there are only one or two examples of each type and style."

#### **Stutz-Stanley House (NR-2653) 209 West Main Street**

This one-and-one-half-story house retains portions of a nineteenth-century dwelling at its core, but displays the exterior appearance of a stylish Craftsman-style bungalow. Clad in dark brown brick veneer, the house sits on a concrete foundation and is topped with a side-gable roof. The roof, along with the front gabled dormer and the roof of a side porch, features flared ends and wide, overhanging eaves that are embellished with brackets. The shed-roofed front porch on the north elevation is enclosed on the east end, forming a sunporch, and supported by full-

height brick piers on the west end; concrete-capped brick piers frame the steps to the porch.

The secondary porch on the west elevation, supported by wood posts on brick piers, shelters an entrance bordered by sidelights and a transom. According to the owner, this was the original entrance to the house, which once faced Main Street but was reoriented to face the driveway during the remodeling. Windows are glazed with double-hung sashes featuring multiple vertical panes over one large pane. A modern garage and connecting hyphen have been added to the rear of the dwelling. A pool has been added behind the house.

The interior of the house reveals many Craftsman-style features, including woodwork, French doors, and a brick fireplace. Nineteenth-century details are also present in the form of four-panel doors, plain wood window and door surrounds, and a staircase with a turned newel and balusters. Most visible framing members in the basement are sawn, indicating a date from the late nineteenth century, but a few sills and floor joists are hewn and likely date to the mid-nineteenth century (perhaps part of an older room in the house or re-used from an earlier structure). Some moldings on the first floor may date to circa 1850 or 1860.

This house is listed in the State Register (per conversation with DHPA staff) and is under review for listing in the National Register. According to the Survey and Registration staff of the Division of Historic Preservation and Archaeology, the Stultz-Stanley House meets Criterion C for Architecture as a Craftsman Bungalow.

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- 8) Attach a high quality photocopy of a map, identifying the location of the project, and showing the relevant portion of the city or town, county, or U.S. Geological Survey quadrangle. Be sure that streets, roads, highways, railroads, rivers, lakes, etc., are clearly identified and that the boundaries of the project area and of any property to be sold leased, altered, demolished, or removed are clearly outlined in a dark ink (highlighter and pencil marks do not photocopy well). If there are other properties within or adjacent to the project area that are or may be at least fifty (50) years of age, then they should be identified on the map and keyed to written descriptions and to any photographs included with the written description and map.
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- 9) Attach recent photographs (exterior and, when relevant to the scope of work, interior) of any structures that may be fifty (50) years old or older and that could be impacted in any way (such as by demolition, rehabilitation, expansion, sale, taking of right-of-way, or visual modification or obscuration) by the project. All photographs must be in color with no more than two photographs per 8 ½" x 11" page. Photographs must be clearly labeled and when possible keyed to site/floor plans.
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- 10) Provide a site plan for projects that will involve new construction, additions to existing buildings, changes in right-of-way or earthmoving activities, showing the footprint of existing and/or proposed buildings or structures with the location of all construction, changes in right-of-way or earthmoving activities on a particular lot or lots depicted as precisely as possible.
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- 11) For projects involving the addition to, or the rehabilitation or restoration of, an historic structure, provide copies of architectural or engineering plans or specifications. Plans are required when the scope of work includes alterations to the floor plan or changes to the configuration of the exterior. Replacement of roofs, windows within their existing openings, and in-kind repairs to existing materials typically do not require architectural plans. If you are unsure if plans would be needed for your project please check with DHPA staff. Provide only those sheets that help to depict character defining features of the historic structure and how they will be altered. Reduce any plan or elevation sheets to no larger than 11" x 17". If pertinent notes on the sheets are too small to read in reduced form, then they should be reproduced elsewhere in the application in larger print or provided digitally as a PDF. Similarly, if the applicant believes it would be useful to provide copies of specifications for the treatment of historically or architecturally significant features, then please reproduce only the most relevant pages from the specifications.
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- 12) If an historic site or historic structure will be altered, demolished, or removed as part of the project, then identify any alternatives that were, or reasonably could be, considered that would not have as great an impact on the historic site or structure. Discuss the advantages and disadvantages of those alternatives and their feasibility. If there are no feasible alternatives, please explain.

INDOT and the City of Westfield examined a range of project alternatives for this project. Community input and consultation were integral to the identification of historic resources, impacts, and additional alternatives. This section begins with a summary of community input on this project, followed by to a discussion of project alternatives, and concludes with a description of commitments prepared to mitigate the impact of the project on historic resources.

#### **Community, Stakeholder, and Interested Party Consultation**

Initially, the City anticipated funding from the Federal Highway Administration (FHWA), which required the project to follow the National Environmental Policy Act (NEPA) and the Section 106 process of the National Historic Preservation Act (NHPA). The Section 106 process was initiated on February 22, 2019 and documents associated with the Section 106 process are available for review online at <http://erms.indot.in.gov/Section106Documents/> and can be found by searching the Des. No. 1801731. Consultation with interested parties has continued after it was determined the project would receive State funding only.

**February 22, 2019:** Section 106 was initiated, and consulting parties were invited to participate.

**May 20, 2019:** 1st Consulting parties meeting held. Three alternatives (Alternatives A, B, and C) were presented for comment and attendees were asked to provide input on the identification of historic resources.

**July 23, 2019:** Community Advisory Committee meeting held to discuss the proposed project alternatives, as well as gain comments and feedback from the CAC members.

**August 22, 2019:** Public information meeting held to introduce the public to the proposed project along with its alternatives and solicit comments to be considered during project development and the environmental analysis.

**September 5, 2019:** A Historic Property Report completed and distributed to consulting parties that identified the **Westfield Historic District** as listed in the National Register and recommended the Julius L. Benson House (IHSSI No.: 057-464-26015) as National Register-eligible (Note: the Benson House is outside of the project limits and will not be impacted by the project activities).

**January 17, 2020:** Responses to the consulting parties' comments are distributed. In response to comments, INDOT and FHWA agree to consider the **Stultz-Stanley House** eligible for listing in the National Register.

May 8, 2020: Following consulting party input and public comments, three additional build alternatives (Alternatives A-1, A-2, and A-3) were developed that could potentially reduce impacts to the Westfield Historic District and the Stultz-Stanley House. Two other alternatives (Alternatives D and E) were also developed that would completely avoid historic properties. A total of eight alternatives were developed for consideration. An Effects Report that examined the impact of each alternative on historic resources was prepared and distributed to consulting parties.

**June 4, 2020:** A second Consulting parties meeting was held to discuss the effects of the project on historic resources.

**September 4, 2020:** Responses to consulting parties' comments were distributed.

**November 2, 2020:** INDOT distributed a letter to consulting parties noting that the project would receive State funds only and would no longer follow the federal Section 106 process. Instead, the project was required to follow the Indiana Historic Preservation and Archaeology Act (IHPAA) and would need to obtain a Certificate of Approval (COA), outlined under Indiana Code (IC) 14-21-1-18. Under IC 14-21-1-18 (a) and (b). Consultation would continue (with "consulting parties" referred to instead as "interested parties") and minimization efforts would continue to be explored.

**November 9, 2020:** INDOT, the City of Westfield, and their consultants completed an Alternative Analysis, per the State Environmental Policy Act (SEPA) to evaluate the alternatives against multiple evaluation criteria including the impacts on historic properties relocations, right-of-way, park and trail impacts, and level of service.

**December 31, 2020:** A State Finding of Area of Potential Effect, Eligibility, and Effects based on the selection of the preferred alternative (Alternative A) was distributed. INDOT found the project would have an adverse effect on the Stultz-Stanley House and Westfield Historic District.

**January 7, 2021:** Interested Parties meeting held (3rd meeting) to discuss mitigation. Interested parties request the examination of a "road diet" option.

**January 20, 2021:** INDOT, the City of Westfield, and their consultants introduce the project to the Indiana Historic Preservation Review Board.

**February 11, 2021:** Interested Parties meeting held (4th meeting) to discuss mitigation and to review the road diet alternative.

Meeting summaries and comments and responses from interested parties and letters of support from community members may be found in Attachment F. Consultation.

### **Alternatives Development**

During initial project development with INDOT, the City of Westfield, and project stakeholders, three preliminary build alternatives were developed (Alternatives A, B, and C).

Alternative A was revised after the identification of the Stultz-Stanley House to avoid the acquisition of that resource. In addition, discussions with consulting parties resulted in three additional build alternatives (Alternatives A-1, A-2, and A-3) that could potentially reduce impacts to the Westfield Historic District and the Stultz-Stanley House. Two other alternatives (Alternatives D and E) were also developed that would completely avoid historic properties. A total of eight alternatives were developed for consideration:

Alternative A: Widen SR 32

Alternative A-1: Reduced Typical Section through Historic District and Closure of Union Street

Alternative A-2: Widen SR 32 with Right-In/Right-Out At Union Street

Alternative A-3: Widen SR 32 Avoidance of Stultz-Stanley House

Alternative B: One-Way Pair SR 32 and Penn Street

Alternative C: One-Way Pair SR 32 and Jersey Street

Alternative D: Bypass

Alternative E: No Build (Do-Nothing)

The alternatives were evaluated to determine if they would meet the purpose and need of the proposed project. If they did not meet the purpose and need, then they were eliminated from further consideration. Two alternatives, Alternative D and E, were determined to not meet the purpose and need and were eliminated from further consideration.

Analysis of the evaluation criteria between alternatives revealed that Alternative A best addressed the purpose and need of the project while balancing the impacts in the project area. Specifically, Alternative A:

- impacts the commercial area of the Westfield Historic District, but not the residential area of the district.
- only relocates a single residential unit and does not disrupt the community cohesion of the existing residential areas.
- neither introduces a high traffic roadway adjacent to residential houses nor does it decrease the efficiency of pedestrians moving through the residential area.
- has a high average travel time benefit due to the reduction in traffic congestion, as well as allows motorists to take a more direct route along SR 32/Main Street.
- avoids impacting the existing local parks and the plans for the community's future use of those parks. It has the second lowest total cost, which accounts for the potential right-of-way cost and the cost of construction.

Therefore, Alternative A was determined to be the preferred alternative. For further details on each of the alternatives and the evaluation of those alternatives, refer to the attached Alternative Analysis report (Attachment E).

The feasibility of implementing a three-lane roadway (also referred to as a "Road Diet" by Interested Parties) was considered early on during project development. In response to comments from consulting parties, this alternative was discussed at the meeting held on February 11, 2021.

Three-lane roadways consists of two travel lanes with a center two-way-left-turn lane. Center two-way-left-turn lanes can reduce traffic congestion caused by left-turning vehicles at various drives and intersections. For SR 32, a center two-way-left-turn lane would not reduce traffic congestion since the existing traffic congestion is due to a lack of vehicle capacity and not the amount of turning vehicles along SR 32. A three-lane roadway was further evaluated by examining the average daily traffic (ADT) for SR 32 and comparing it to industry accepted standards. The existing ADT on SR 32 is approximately 16,700 vehicles per day (vpd), which exceeds the 16,380 vpd threshold for a three-lane roadway and would not have adequate capacity for the existing SR 32 traffic. When considering the design year (2042) of the project, the ADT for SR 32 is anticipated to be 23,600 vpd, which is significantly higher than the ADT threshold for three-lane roadways. Implementing a three-lane roadway would not correct any of the existing traffic congestion issues and would result in the traffic congestion continuing to increase significantly in the future. Therefore, a three-lane roadway would not meet the need of the project.

As noted above, project designers have minimized the impact to historic properties by moving the road to the north of the Stultz Stanley House, thereby not impacting the house at all and only acquiring 0.016 acre of land from the historic property. In addition, landscaping and a context-sensitive retaining wall will separate the undertaking from the yard. This results in the acquisition of one property (144 W Main Street) on the north side of SR 32 that is not historic but preserves the Stultz Stanley House.

Project designers have minimized the impacts of the preferred alternative to the Westfield Historic District in order to retain Jan's Pizza (108 South Union Street; shown as 104 South Union Street in the National Register nomination).

### **Mitigation Commitments**

To mitigate the adverse impacts to the district, INDOT, Westfield, and its consultants have met with interested parties on two separate occasions in January and February 2021 to develop appropriate mitigation (see attached meeting summary from January 7, 2021; the meeting summary from February 11, 2021 will be distributed to interested parties and review board members at a later date). Mitigation for these types of impacts is complex; therefore, INDOT and the City of Westfield will establish a Historic Preservation Advisory Committee to review and comment on mitigation. With the loss of four buildings, there is a potential that the Westfield Historic District will no longer be eligible in its present configuration since Contributing resources will be removed from the southern half of the intersection of Union and Main Streets. Consultation will occur with the DHPA's National Register staff to ascertain if the boundaries will need to be re-drawn for a smaller district. A new National Register application will be considered as part of the mitigation.

Indiana Landmarks has suggested the establishment of a local historic preservation commission; exploring the feasibility of such an ordinance is also included as a commitment. Others have suggested the relocation of the building at 102 S. Union Street (also referred to as Erika's Place) to another location within the City of Westfield. Relocation of 102 S Union Street will be evaluated and will be completed if feasible. Other robust mitigation measures that speak to the historic themes embodied in the historic district will also be discussed with interested parties including context sensitive design.



Mitigation commitments that speak to those specific items noted above are included as Attachment G. The Review Board will be updated as these commitments are refined in consultation with INDOT, the City of Westfield, and interested parties.

INDOT and City of Westfield respectfully request this Certificate of Approval be granted based on the mitigation commitments developed in consultation with DHPA and Interested Parties.

- 
- 13) Certificates of approval granted by the Indiana Historic Preservation Review Board expire two (2) years from issuance, unless otherwise specified or extended by action of the board. If requesting a longer timeframe for completion, please note the time (in years) and briefly state reason(s) below.

INDOT and the City of Westfield request a five-year timeframe, with completion by 2026. This request is due to the construction timeline and to allow sufficient time to complete the commitments

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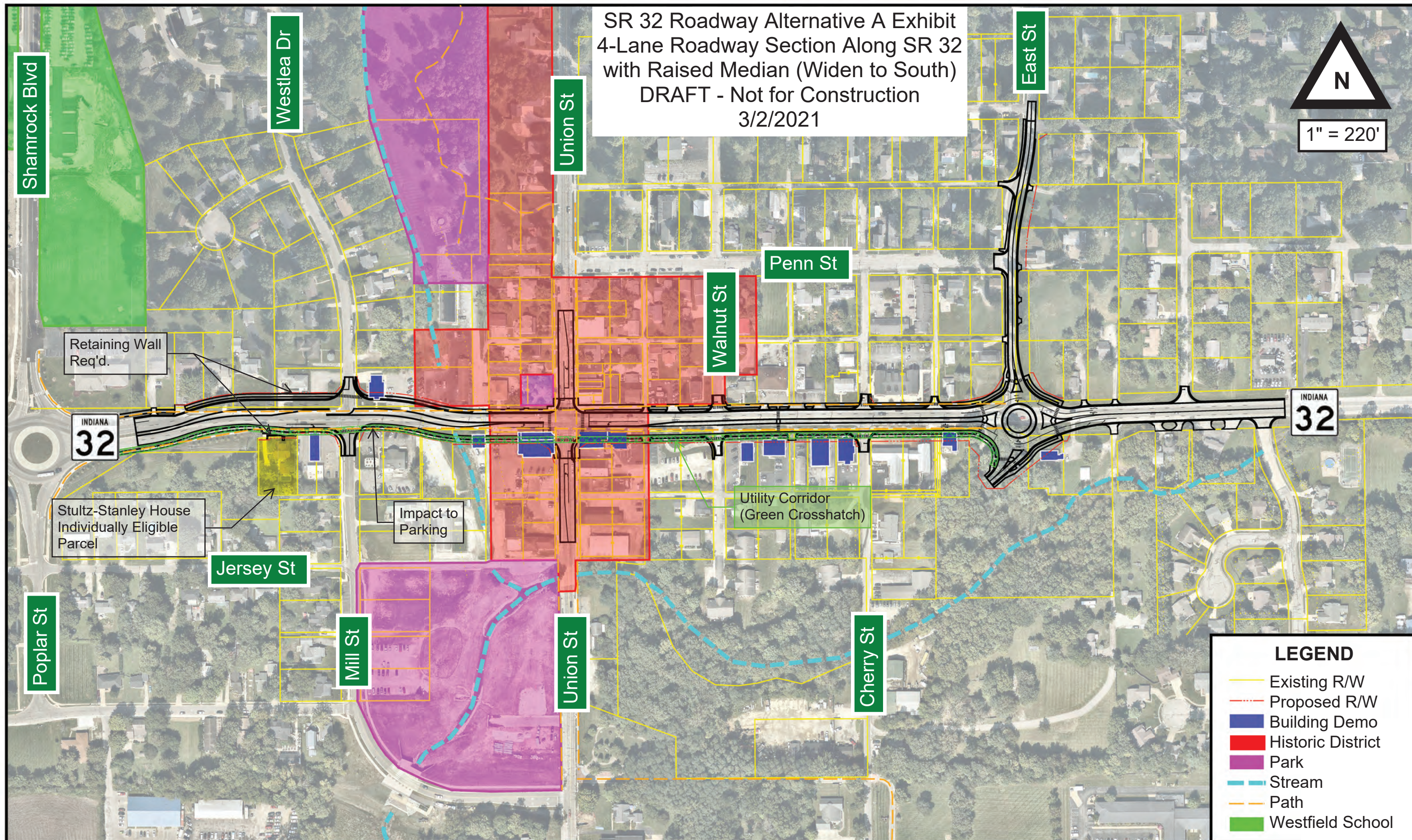
### Attachment G. Commitments

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WEINTRAUT & ASSOCIATES, INC.

**ATTACHMENT A. Project Maps**





SR 32 Roadway Alternative A Exhibit  
4-Lane Roadway Section Along SR 32  
with Raised Median (Widen to South)  
DRAFT - Not for Construction  
3/2/2021

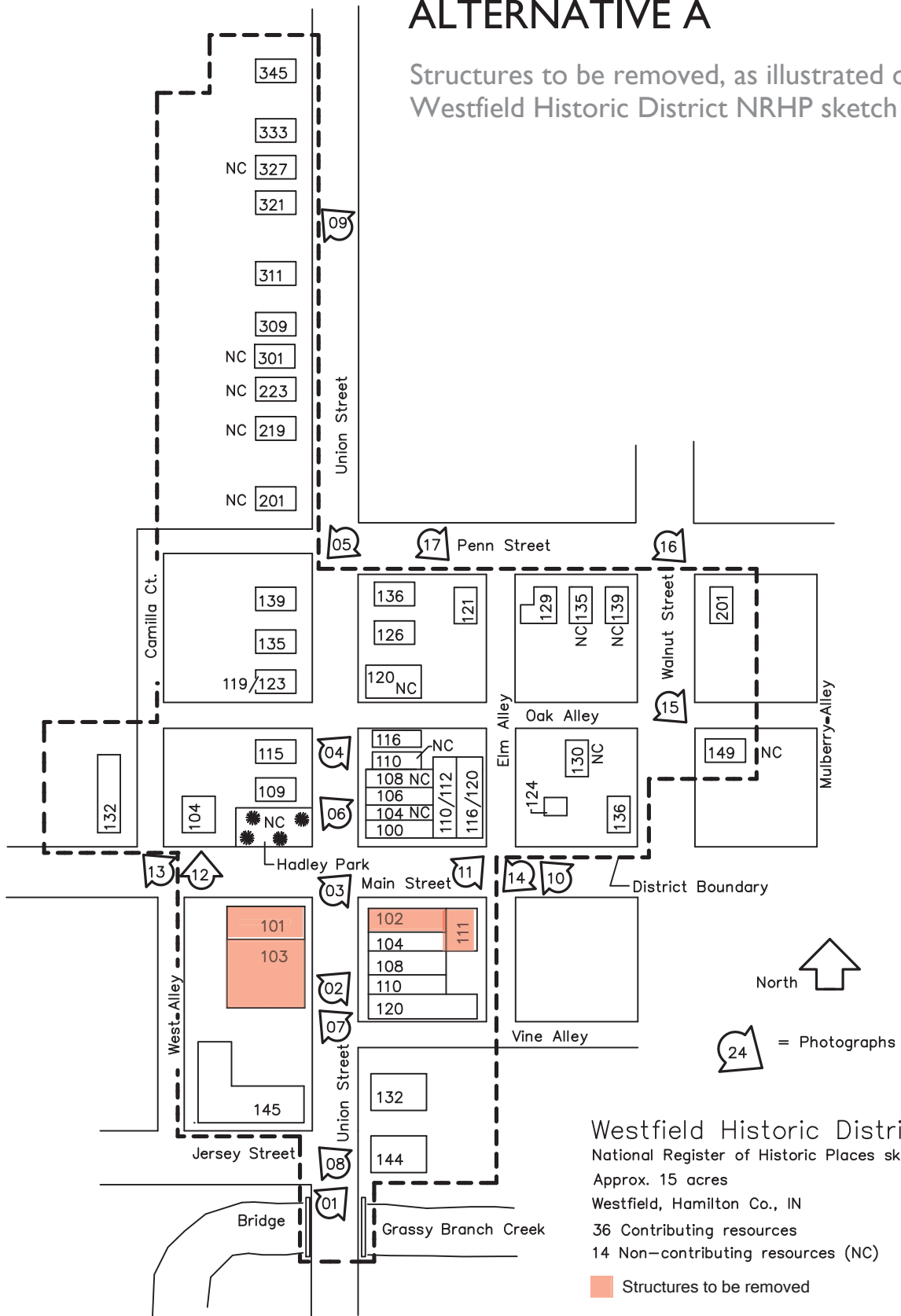
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1" = 220'

- LEGEND**
- Existing R/W
  - Proposed R/W
  - Building Demo
  - Historic District
  - Park
  - Stream
  - Path
  - Westfield School

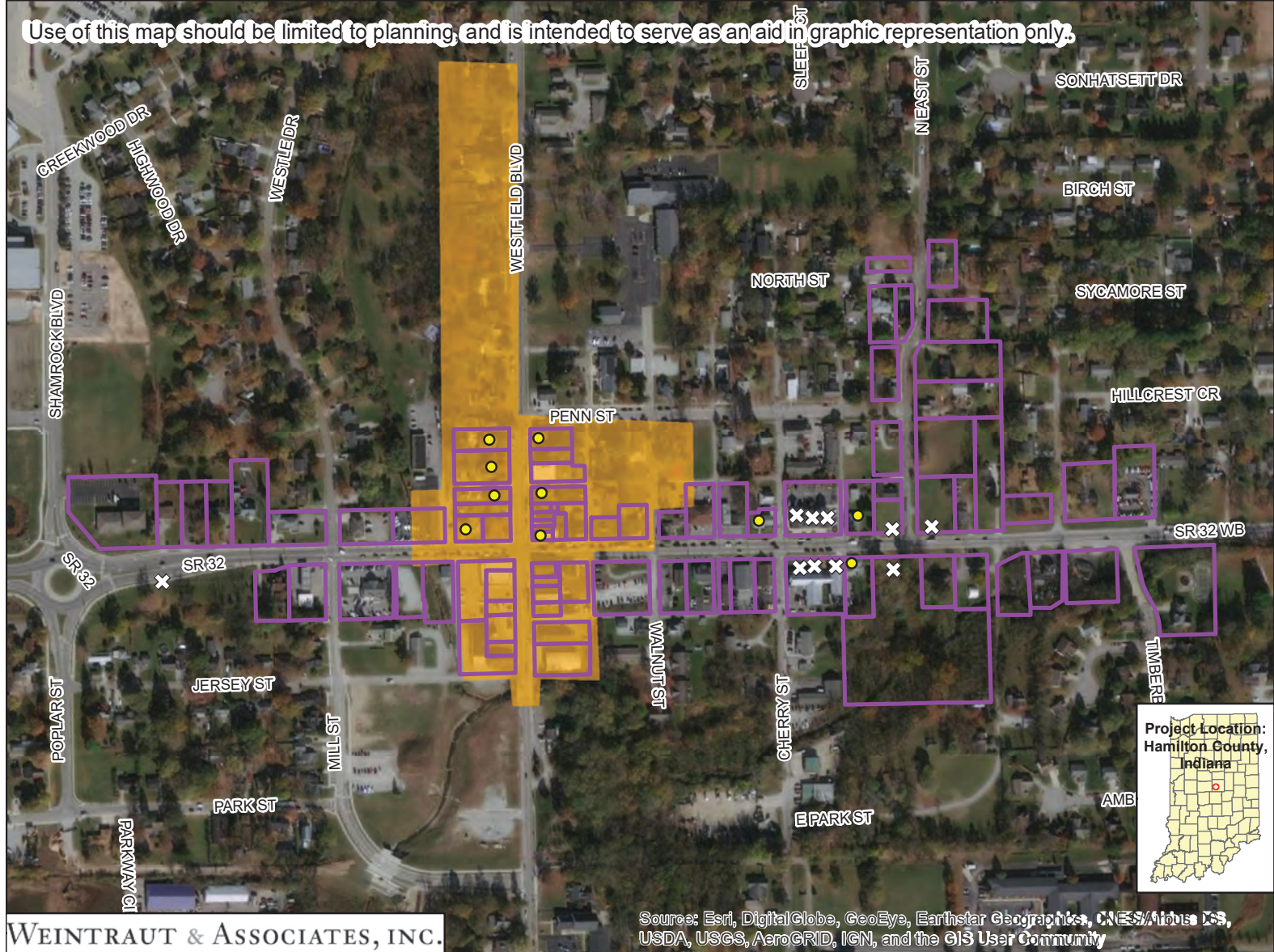


# ALTERNATIVE A

Structures to be removed, as illustrated on the Westfield Historic District NRHP sketch map.

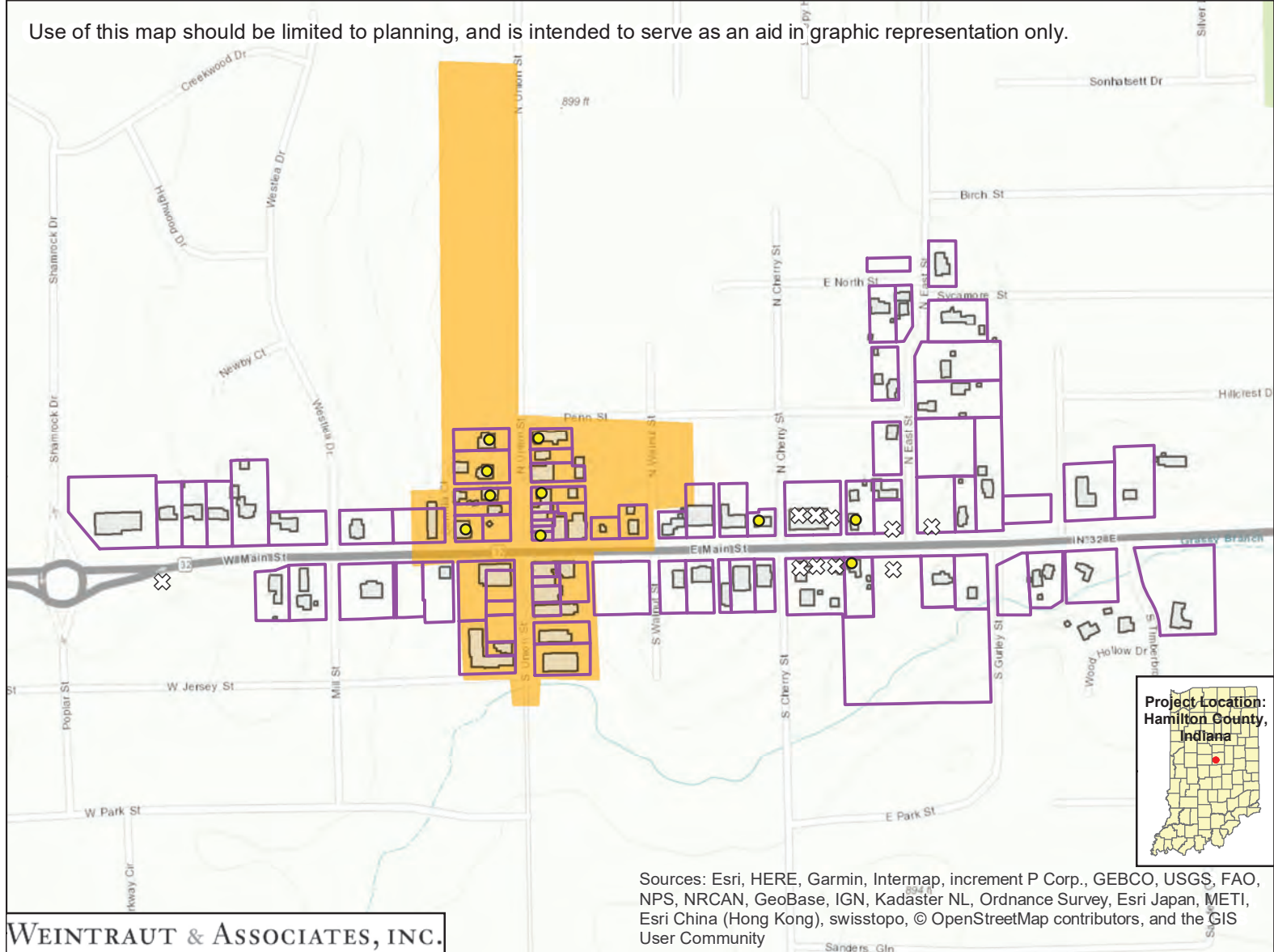


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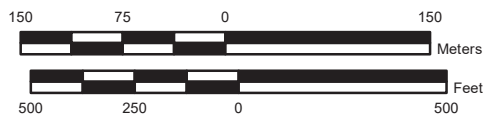


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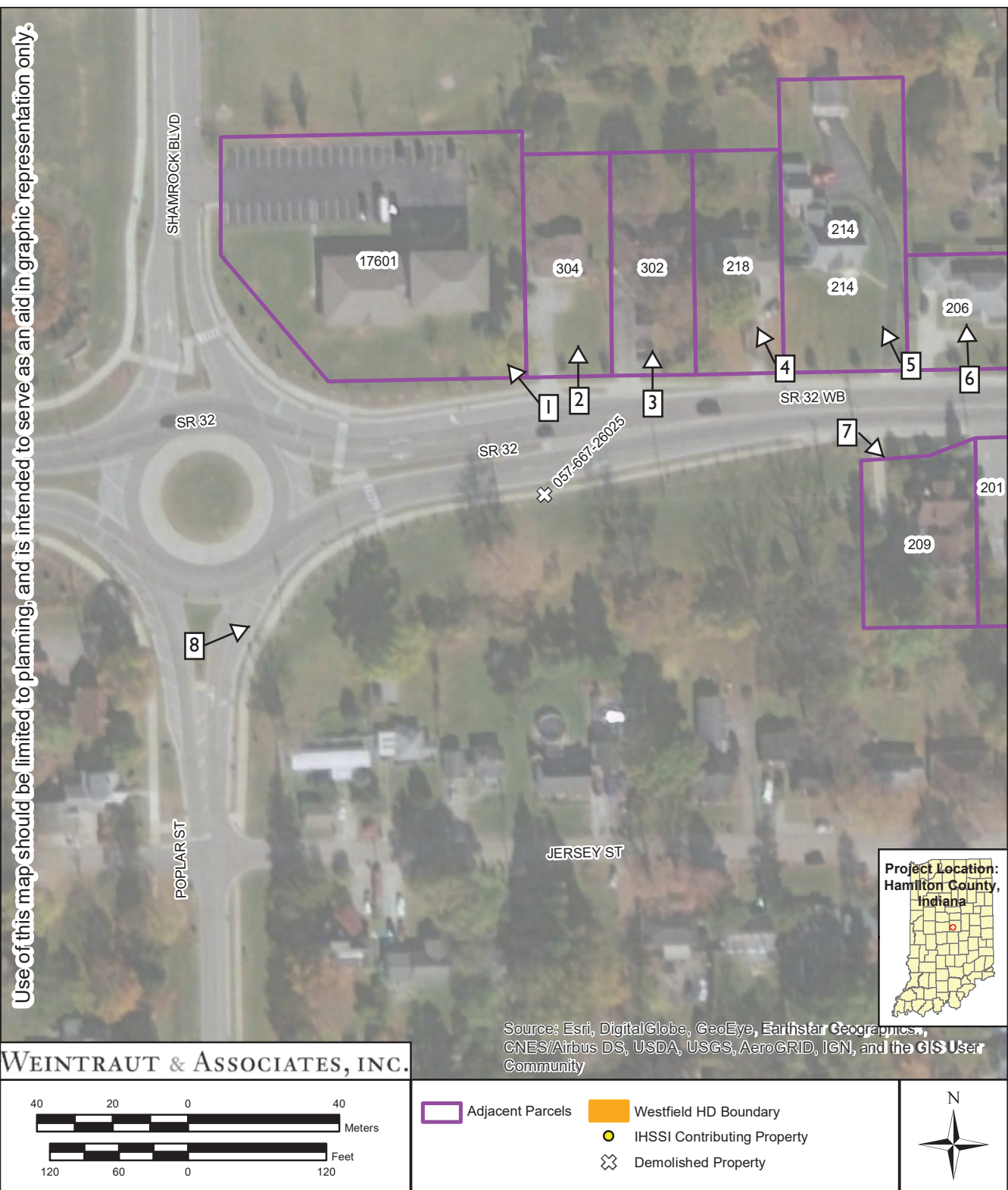


- Building Outline
- Adjacent Parcels
- Westfield HD Boundary
- IHSSI Contributing Property
- Demolished Property



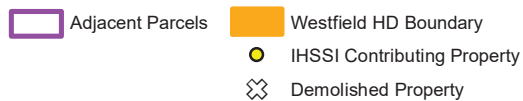
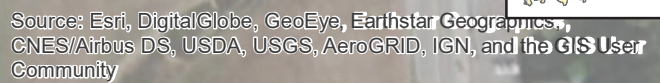


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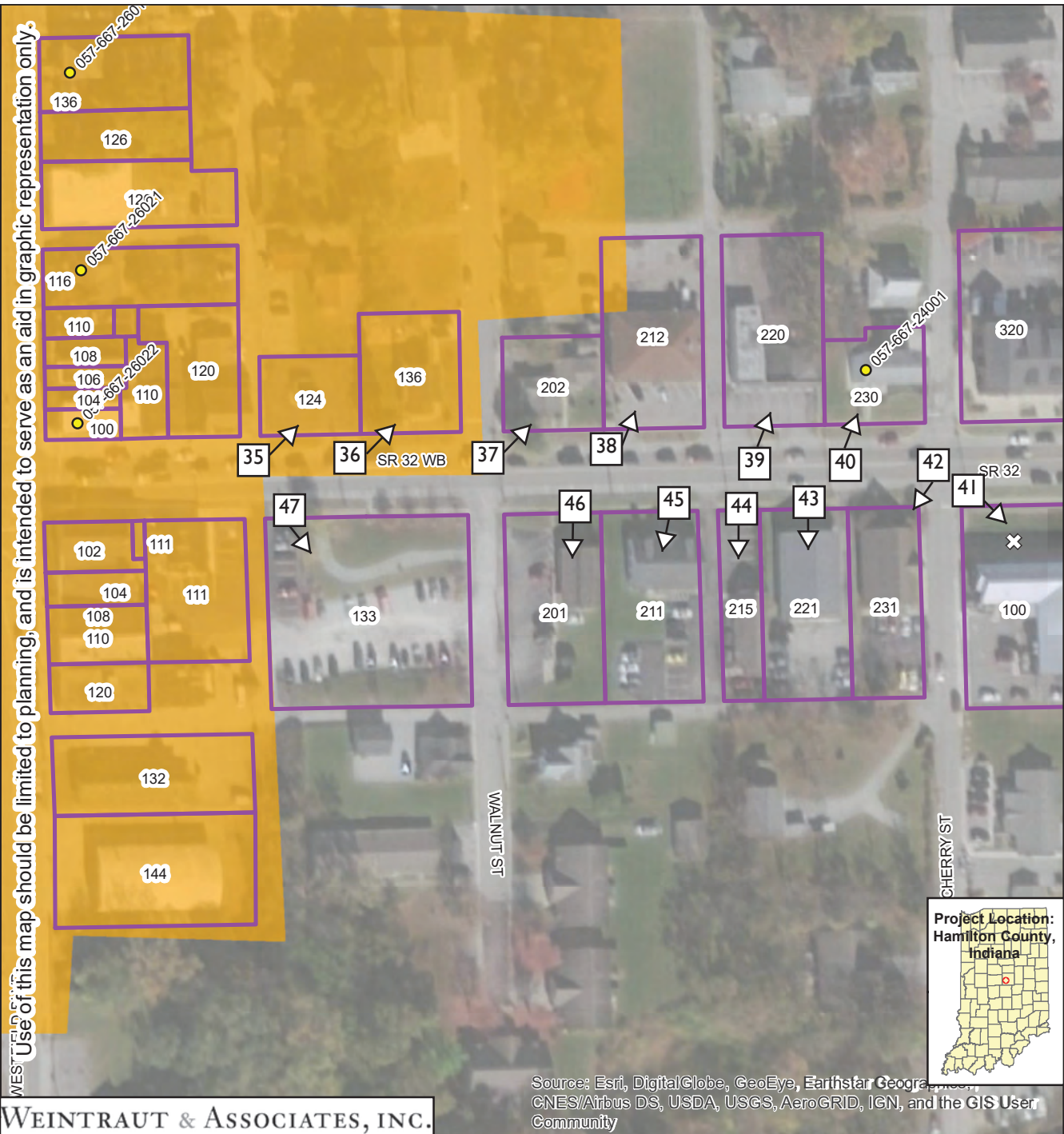




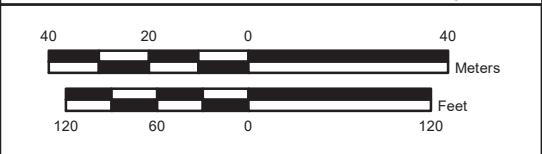
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Adjacent Parcels

Westfield HD Boundary

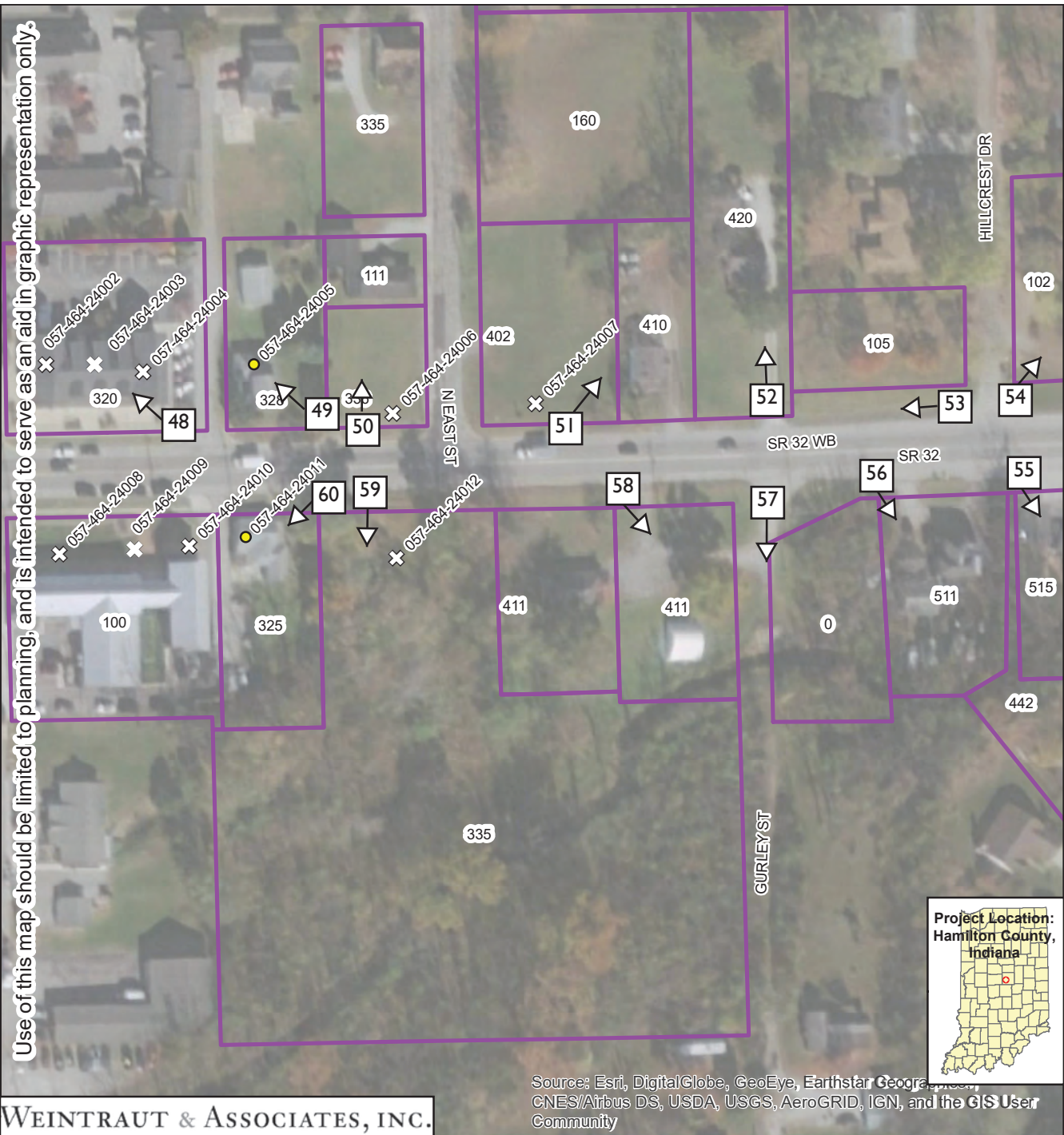
IHSSI Contributing Property

Demolished Property





Use of this map should be limited to planning, and is intended to serve as an aid in graphic representation only.



Project Location:  
Hamilton County,  
Indiana

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

**WEINTRAUT & ASSOCIATES, INC.**

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20

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40

Meters

120

60

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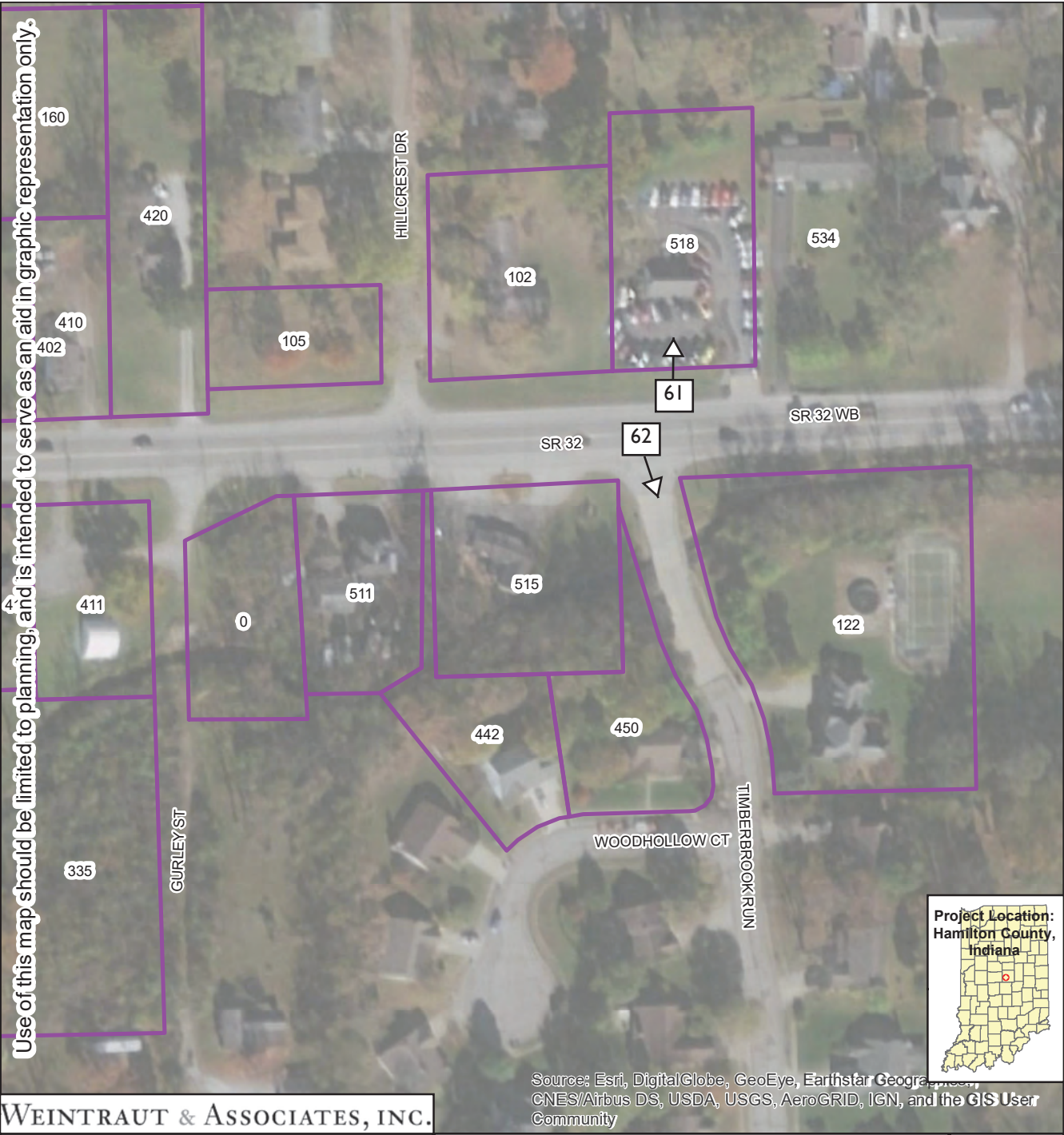
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Feet

- Adjacent Parcels
- Westfield HD Boundary
- IHSSI Contributing Property
- Demolished Property

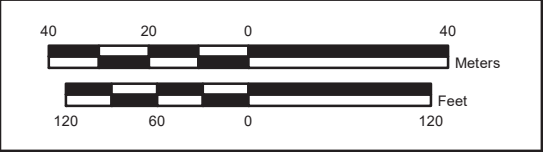


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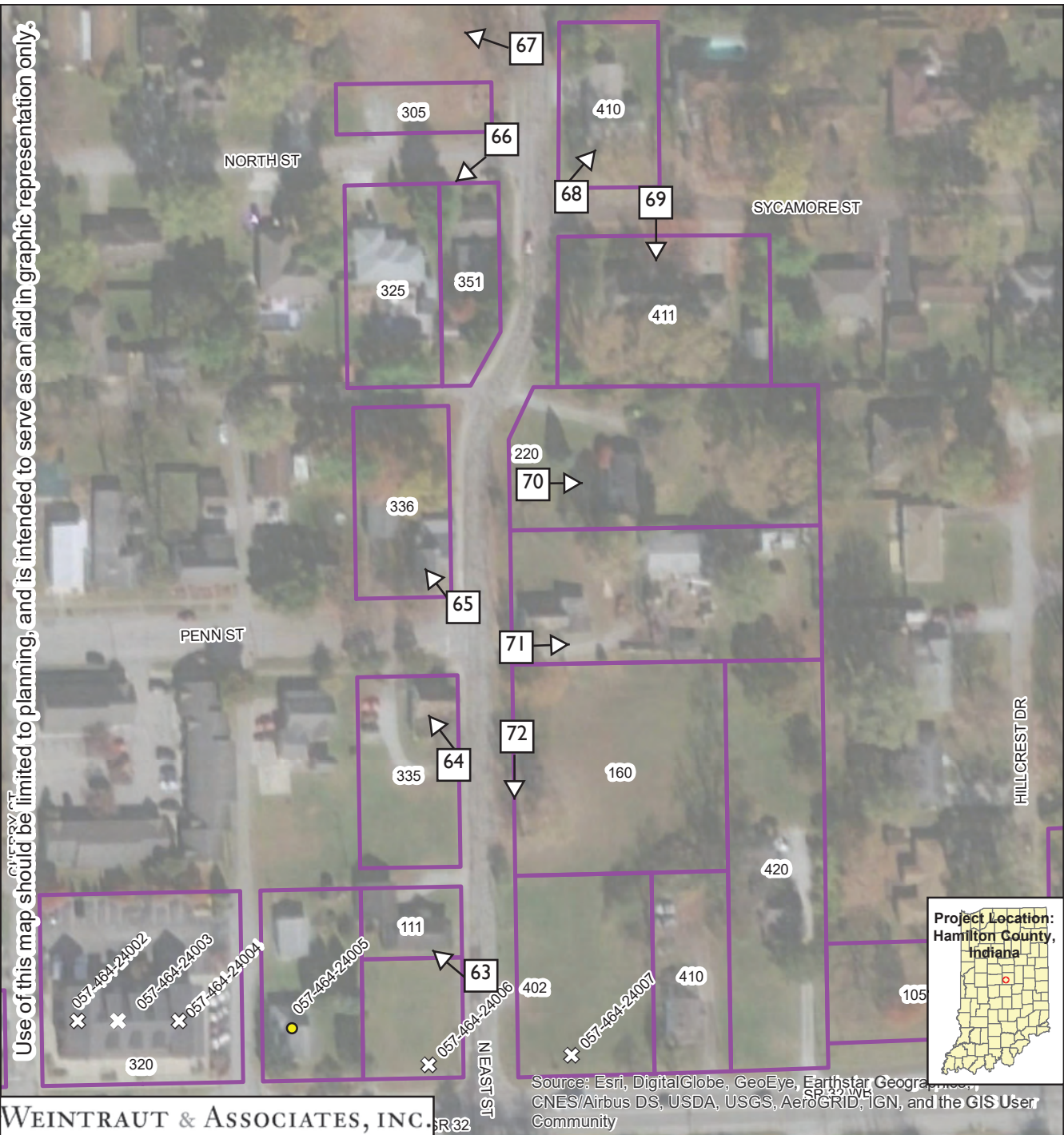


- Adjacent Parcels
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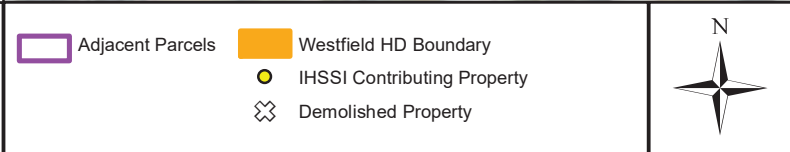
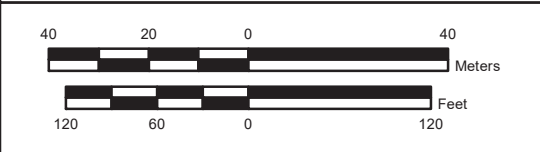


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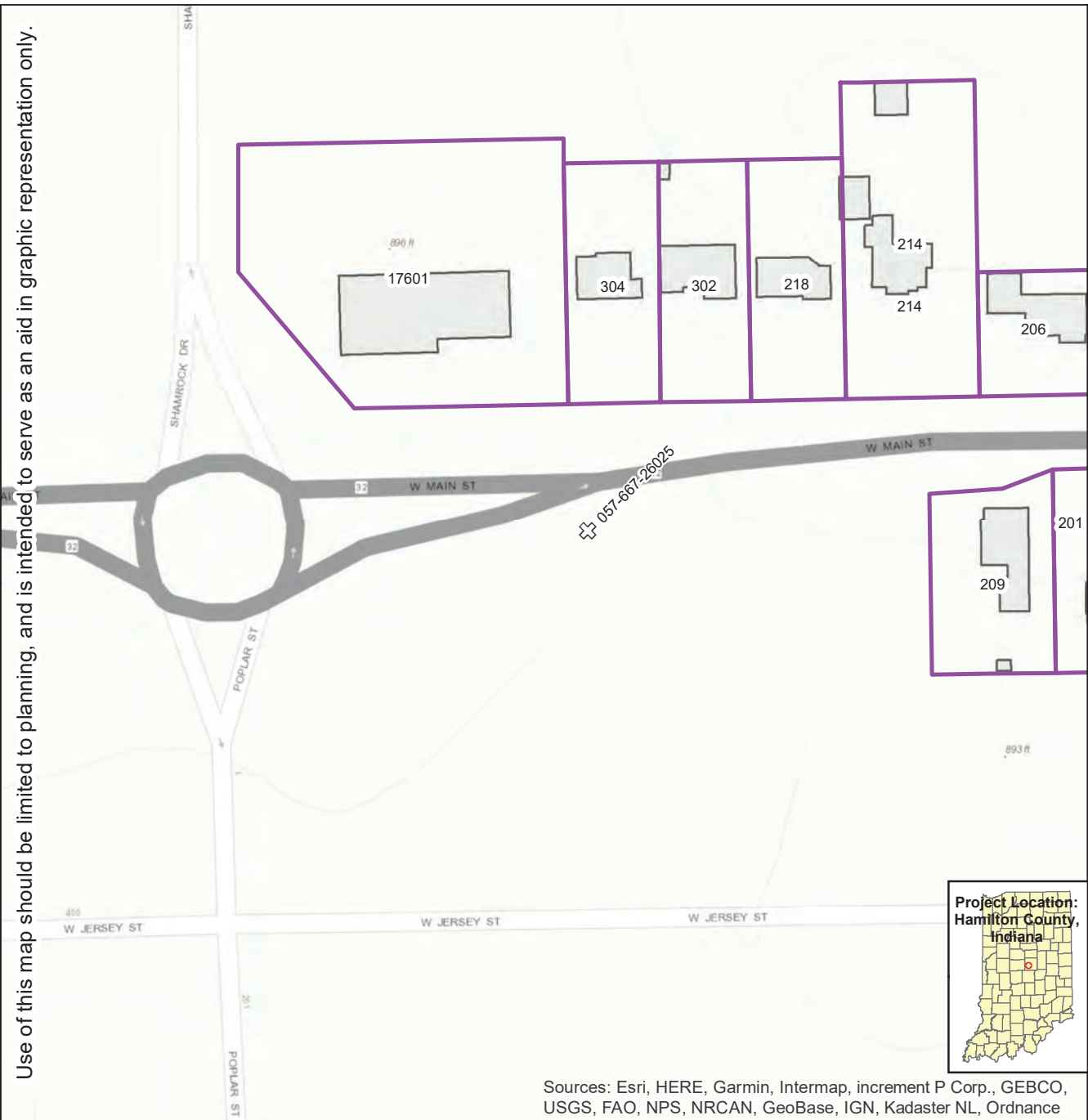


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- |  |   |
|--|---|
|  Building Outline |  Westfield HD Boundary       |
|  Adjacent Parcels |  IHSSI Contributing Property |
|  |  Demolished Property         |

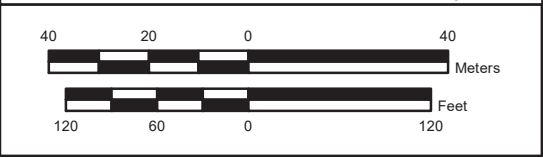


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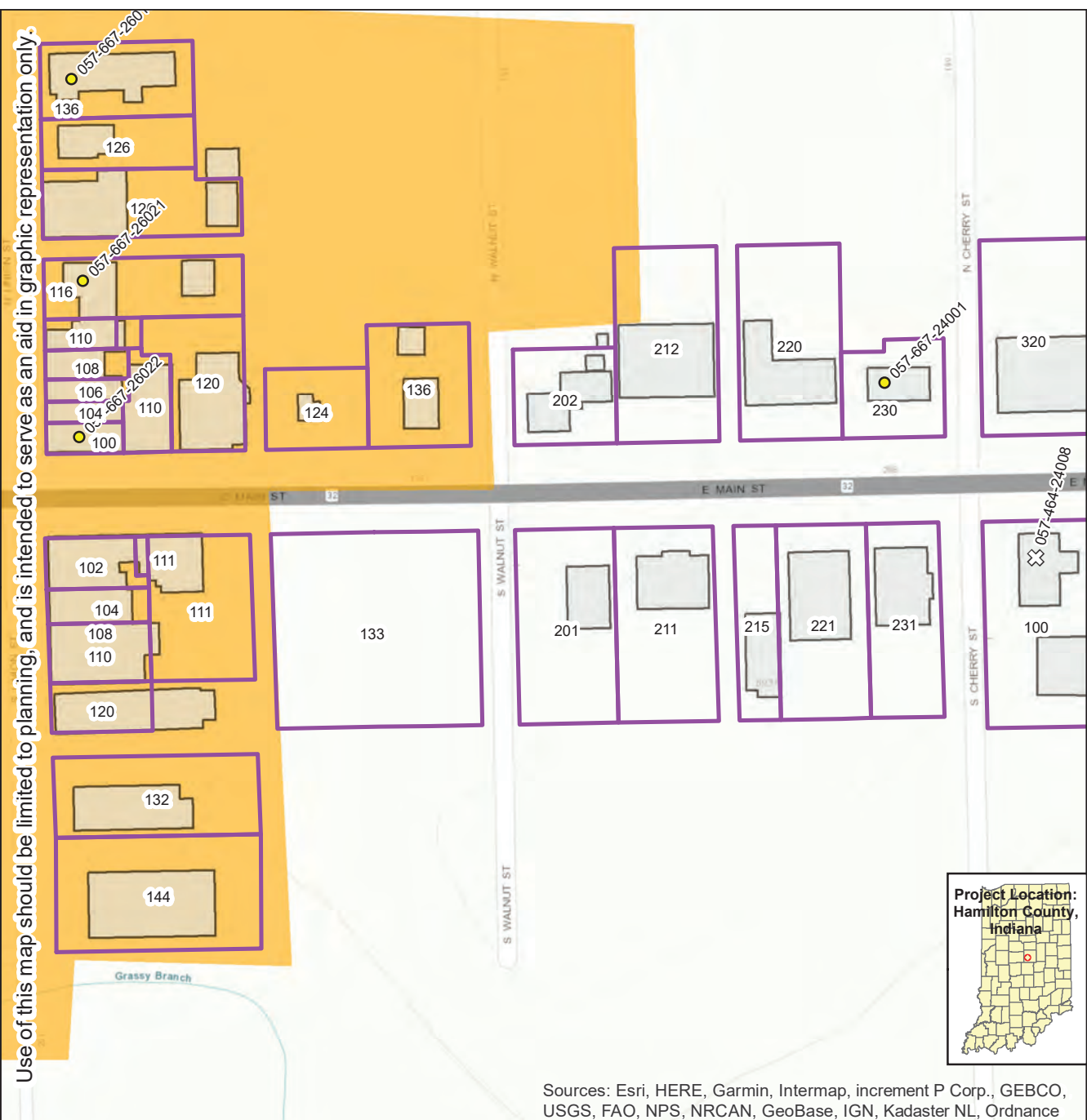
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- Building Outline
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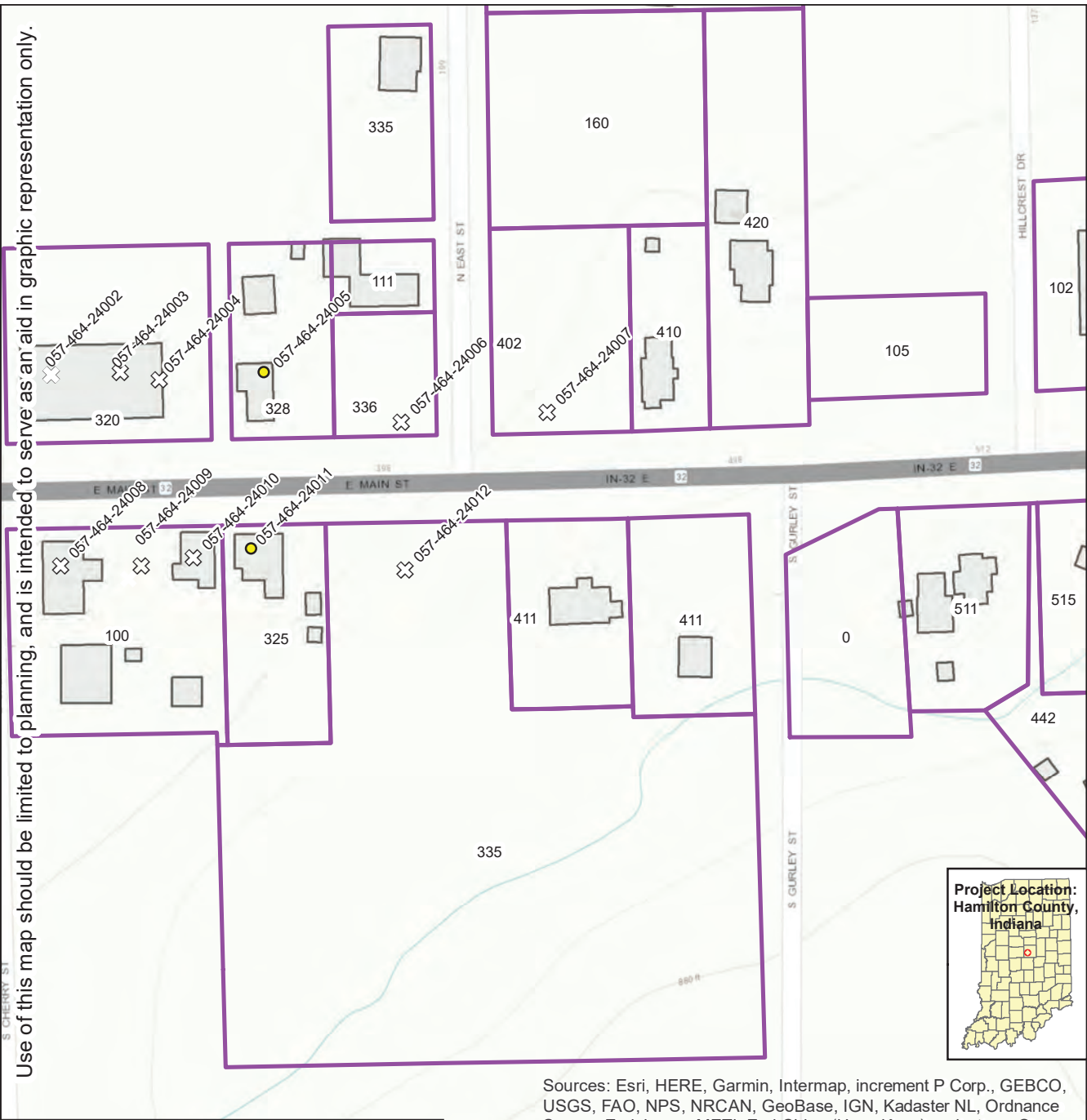
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 	Building Outline Adjacent Parcels	Westfield HD Boundary IHSSI Contributing Property Demolished Property	
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Project Location:  
Hamilton County,  
Indiana

Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community

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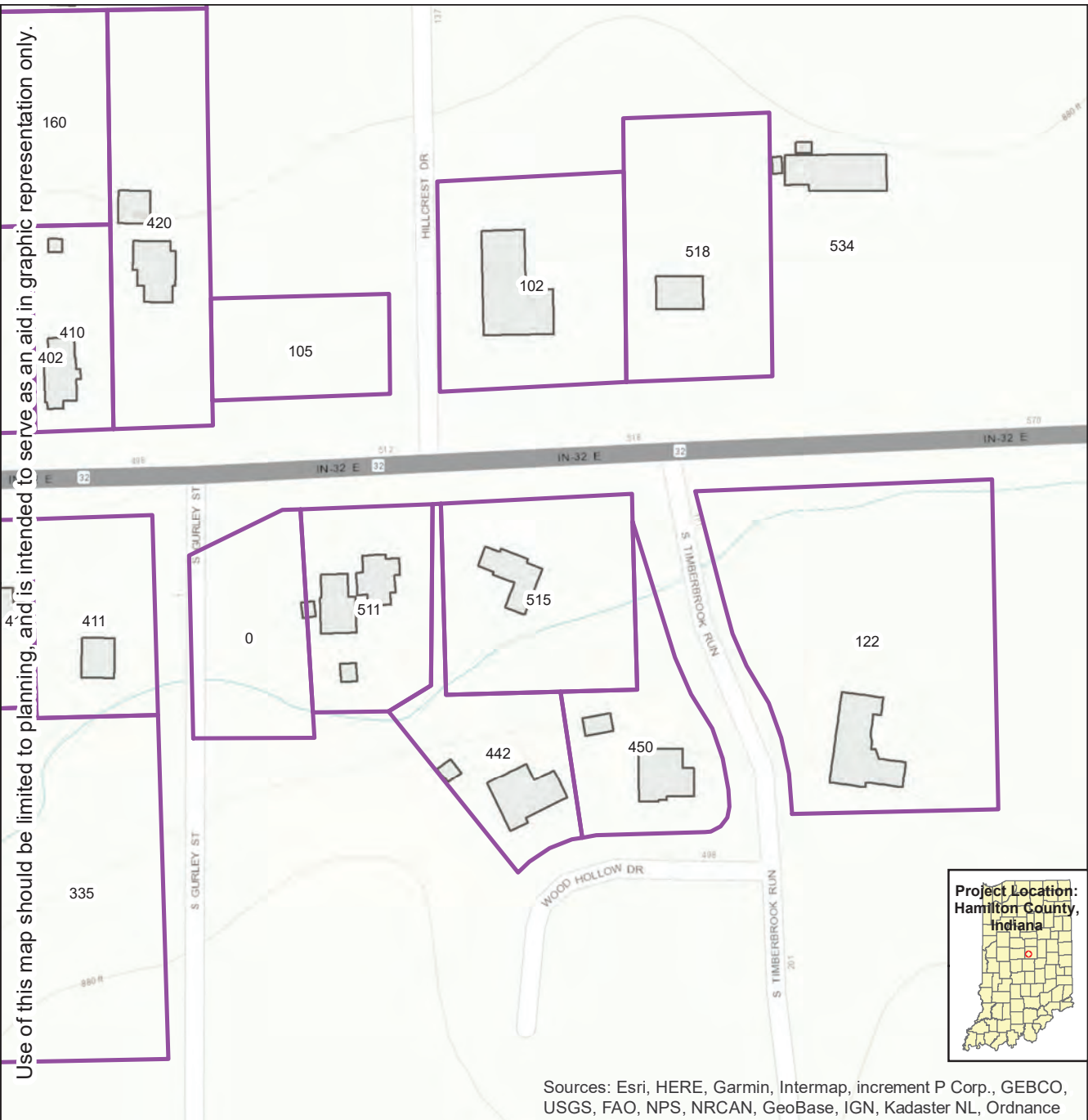
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- Building Outline
- Adjacent Parcels
- Westfield HD Boundary
- IHSSI Contributing Property
- Demolished Property

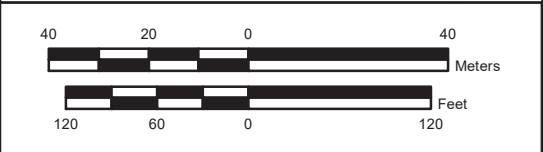


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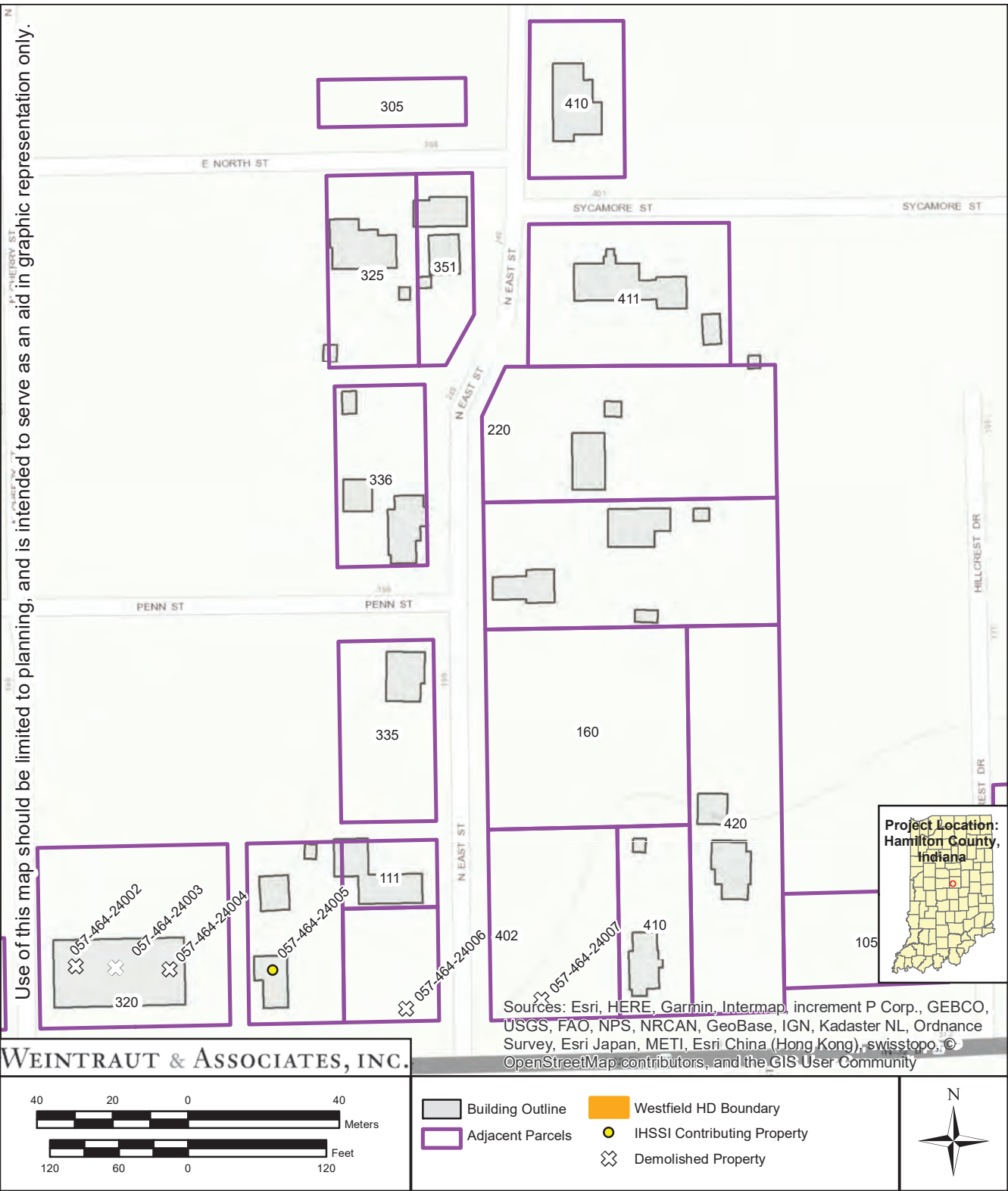
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**ATTACHMENT B. List of Properties**

ADDRESS	PHOTO NO.	IHSSI NO.	BUILD DATE	IS PROPERTY WITHIN WESTFIELD HISTORIC DISTRICT?	IS PROPERTY CONTRIBUTING TO WESTFIELD HISTORIC DISTRICT?	WOULD THE PROPERTY BE REMOVED?	COMMENTS
17601 Shamrock Boulevard	1	N/A	1984/2001	N	N/A	N	Modern two story medical office.
304 West Main Street	2	N/A	1956	N	N/A	N	Ranch house clad in siding with new garage door, entry door, and porch.
302 West Main Street	3	N/A	1977	N	N/A	N	Courtyard Ranch with stone veneer and converted garage; operates as a business.
218 West Main Street	4	N/A	1977	N	N/A	N	Massed-two story home with stone on the first level and siding on the second level; attached garage.
214 West Main Street	5	N/A	1940	N	N/A	N	Brick, Tudor Revial with steeply pitched roof and side/rear addition.
206 West Main Street	6	N/A	1958	N	N/A	N	Ranch house clad in stone veneer and siding; operates a business.
209 West Main Street	7	N/A	1920	N	N/A	N	The Stultz-Stanley House displays Craftsman style details. The core of the home is a mid-19th century house that was rotated and converted to a Craftsman style house in the 1920s. The original entry is visible west side of the home.
West Main Street & Poplar Street	8	057-667-26025	Grass Lawn	N	N	N	Area currently in public right-of-way. Includes former site of IHSSI No. 057-667-26025 which has been demolished.
144 West Main Street	9	N/A	1960	N	N/A	Y	One-story, stone clad bank building with arched covered entry.
132 West Main Street	10	N/A	1965	Y	Y	N	Former Dog N' Suds drive-in. The building includes an enclosed kitchen area and a sixteen-bay canopy roof to shelter cars.
104 West Main Street	11	057-667-26024	1911/1918	Y	Y	N	The Carnegie Library was designed by Robert F. Daggett & Co.; L.L. Cox & N.A. Earl were the contractors. This Neoclassical building rests on a raised foundation, brick clad, and topped by a hipped roof.
100 West Main Street	12	N/A	c. 1995	Y	N	N	Hadley Park
109 North Union Street	13	N/A	1934	Y	Y	N	One-and-one-half story American Small House displays elements of the English Cottage style. Local doctor A.F. Connoy practiced from this building.
115 North Union Street	14	057-667-26020	1865	Y	Y	N	Two-story Italianate/I-house is identified as the Paul Brown-Dr. Link Baldwin House. Dr. Baldwin was a local physician.
119/123 North Union Street	15	057-667-26019	1885/1900	Y	Y	N	This gabled-ell house was likely constructed in two phases. The façade includes a shed-roof porch supported by Doric columns.
135 North Union Street	16	057-667-26009	1901	Y	Y	N	Two-story clapboard house with corner porch and hipped roof operated as a Boarding House.
136 North Union Street	17	057-667-26018	1870	Y	Y	N	Two-story Italianate Cube known as"Oscar Brown House."
126 North Union Street	18	N/A	1900	Y	Y	N	One-and-one-half story gable front house is clad in vinyl siding with enclosed porch.
120 North Union Street	19	N/A	c.1920/2005	Y	N	N	This one-story building served as Westfield Cafeteria. The building has been remodeled.

I 16 North Union Street	20	057-667-26021	c. 1860	Y	Y	N	This one-and-one-half story Gable-front house displays Greek Revival and Queen Anne style elements.
I 04 North Union Street	21	N/A	c. 1910	Y	N	N	This one-story, three bay brick commercial building has segmental arched openings and a central entry.
I 06 North Union Street	21	N/A	1920	Y	Y	N	Two-story brick Commercial building served as Cunningham's Bakery.
I 08 North Union Street	21	N/A	1910/1960	Y	N	N	One-story commercial building with parapet was remodeled around 1960.
I 10 North Union Street	21	N/A	1910/2000	Y	N	N	One-story brick commercial building with parapet roof was remodeled around 2000.
I 00 North Union Street	22	057-667-26022	1899	Y	Y	N	Two-story Romanesque structure with corner entry served as the State Bank Building.
I 10/I 12 East Main Street	23	N/A	1900	Y	Y	N	Adjacent to reconstruction. Gable-front building with two storefronts. Former Knights of Pythias Lodge & Butcher Shop.
I 11 East Main Street	25	N/A	1959	Y	Y	Y	Former Westfield Savings & Loan. Mid-Century Modern, one-story building clad in glass and limestone ashlar.
I 02 South Union Street	26	N/A	c. 1860	Y	Y	Y	The two-story, wood clad building is topped by a gable roof. The building served as Fuderburgh's grocery store.
I 08 South Union Street	27	N/A	c. 1900	Y	Y	N	One-story brick structure is identified as a Commercial building/Italianate in the National Register nomination.
I 10 South Union Street	27	N/A	1910	Y	Y	N	This one-story, brick building is set on a raised foundation and accessed via three concrete steps to a raised entry. It is identified as a Hardware/Commercial building in the National Register nomination.
I 12 South Union Street	27	N/A	1966	Y	Y	N	Simple, one-story commercial building with a parapet roof.
I 20 South Union Street	27	N/A	c. 1965	Y	Y	N	One-story concrete building with enclosed south entrance is topped by a flat roof. This building was a telephone service office for Westfield.
I 32 South Union Street	28	N/A	1968	Y	Y	N	This one-story, yellow brick clad gable-front building served as the United State Post Office.
I 44 South Union Street	28	N/A	1960	Y	Y	N	Commercial building with a stepped parapet façade, retail/storage area, and a garage bay.
Bridge carrying Union Street over Grassy Branch Creek	29	N/A	1961/1997	Y	Y	N	This continuous, three-span reinforced concrete bridge was constructed in 1961 and reconstructed in 1997. It was determined not individually eligible for the NRHP as part of the Indiana Historic Bridge Inventory.
I 45 South Union Street	30	N/A	1923/c.1990	Y	Y	N	This Craftsman style building operated as the Old City Hall and Fire station. It originally served as a gas station on the old route of US 31. It was reconstructed around 1990.
I 01 South Union Street	31	N/A	1924	Y	Y	Y	One-story brick commercial building with a recessed corner entry. Emmet and Chase Mendenhall constructed the building for their drugstore, which included a pharmacy and soda fountain.

103 South Union Street	31	N/A	c. 1950	Y	Y	Y	One-story brick commercial building with a recessed entry operated as the Regal Grocery Store.
119 South Union Street	31	N/A	Vacant Lot	Y	Y	N	Paved lot/parking area south of 103 South Union.
125 West Main Street	32	N/A	1940	N	N/A	Y	Gabled, concrete block commercial building has cladding on the Main Street elevation and newer windows.
131 West Main Street	32	N/A	Parking	N	N/A	N	Parking area is between 137 and 125 West Main Street
137 West Main Street	33	N/A	1971	N	N/A	N	This gabled brick building operates as a restaurant.
201 West Main Street	34	N/A	1987	N	N/A	Y	One-story gas station with pumps and canopy.
124 East Main Street	35	N/A	1920	Y	Y	N	One-story Cottage-style brick building is the former Phillips 66 Gas Station.
136 East Main Street	36	N/A	1915	Y	Y	N	This two-story Gable-front Craftsman is clad in stucco.
202 East Main Street	37	N/A	1900	N	N/A	N	Simple, one-story L-shape residence has been converted to an office with additions.
212 East Main Street	38	N/A	1976	N	N/A	N	One-story, brick clad commercial building is topped with a pyramidal roof and includes two bow windows.
220 East Main Street	39	N/A	1948	N	N/A	N	Concrete block commercial building with brick-clad façade; replacement windows.
230 East Main Street	40	057-667-24001	1853	N	N/A	N	This two-story, side-gabled Greek Revival served as the Westfield Masonic Lodge. Since the IHSSI, windows have been replaced and the stoop has been removed among other changes.
100 South Cherry Street	41	057-464-24008, 057-464-24010	2018	N	N/A	N	This modern property is the on site of two demolished resources, IHSSI No.: 057-464-24008 & 057-464-24010.
231 East Main Street	42	N/A	1989	N	N/A	Y	O.W. Krohn & Associates, LLP operates from this modern building.
221 East Main Street	43	N/A	1995	N	N/A	Y	ADS Cabinets operates from this modern building.
215 East Main Street	44	N/A	1999	N	N/A	N	This modern building clad in brick and vinyl is a business.
211 East Main Street	45	N/A	1995	N	N/A	Y	This one-story, brick clad modern building operates as a business.
201 East Main Street	46	N/A	1987	N	N/A	Y	Modern gambrel roof building includes a Subway restaurant.
133 East Main Street	47	N/A	Parking area	N	N/A	N	Parking area; lot also includes a grassed area and sculpture.
320 East Main Street	48	057-464-24002, 057-464-24003, 057-464-24004	2008	N	N/A	N	This building replaced the former IHSSI Nos.: 057-464-24002 (House), 057-464-24003 (Vacant Lot), 057-464-24004 (House).
328 East Main Street	49	057-464-24005	1900	N	N/A	N	This one-and-one-half story gable front building was identified as Contributing in the former Westfield IHSSI district (IHSSI No.: 057-464-24005).
336 East Main Street	50	057-464-24006	Vacant lot	N	N/A	N	This vacant lot was once the site of a contributing House in the Westfield IHSSI district (IHSSI No.: 057-464-24006)
402 East Main Street	51	057-464-24007	Vacant lot	N	N/A	N	This vacant lot was once the site of a contributing House in the Westfield IHSSI district (IHSSI No.: 057-464-24007)
410 East Main Street	51	N/A	1950	N	N/A	N	This gable-front building had an addition extending from the central roof ridgeline.
420 East Main Street	52	N/A	1900	N	N/A	N	This side-gabled Craftsman has additions. It is set back on a longer drive.
105 Hillcrest Drive	53	N/A	Vacant lot	N	N/A	N	Vacant lot/grassed lawn is part of the Roberts Rolling Acres addition.

102 Hillcrest Drive	54	N/A	1960	N	N/A	N	L-shaped brick Ranch is within the Roberts Rolling Acres addition.
515 East Main Street	55	N/A	N/A	1953	N	N	This one story Ranch is clad in brick and siding.
511 East Main Street	56	N/A	1880	N	N/A	N	This two-story Italianate home is clad in asbestos shingle siding and topped by a hipped roof. It has a small enclosed entry on the east side and porch additions on the west side.
0 Gurley Street	57	N/A	Vacant lot	N	N/A	N	Vacant parcel. Gurley Street is closed south of Main/SR 32.
411 East Main Street	58	N/A	1955	N	N/A	Y	This hipped roof Ranch is clad in siding and retains its original door. A Quonset hut is also on the property.
335 East Main Street	59	057-464-24012	Vacant lot	N	N/A	N	This vacant lot was once the site of a contributing House in the Westfield IHSSI district (IHSSI No.: 057-464-24012)
325 East Main Street	60	057-464-24011	Indeterminate	N	N/A	Y	This side-gable house was identified as a Non-Contributing resource in the former Westfield IHSSI district (IHSSI No.: 057-464-24011). It has rear additions.
518 East Main Street	61	N/A	1987	N	N/A	N	This side-gable house is used as an office for a car dealership.
122 Timberbrook Run	62	N/A	1995	N	N/A	N	Part of a modern subdivision on the southside of Main Street/SR 32.
111 North East Street	63	N/A	c. 1900	N	N/A	N	One-story Craftsman-style house has a rear additional and enclosed porch with new deck.
335 Penn Street	64	N/A	1900	N	N/A	N	This one-story gabled building has a porch and rear addition on the East Street elevation, adjacent to the project.
336 Penn Street	65	N/A	1900	N	N/A	N	This one and one-half story Craftsman is an altered example of its type with a new gable window and additions.
325 East North Street	66	N/A	1990	N	N/A	N	Modern residence is located west of 351 East North Street.
351 East North Street	66	N/A	1954	N	N/A	N	Side gabled Ranch House with an addition.
305 North East Street	67	N/A	Vacant lot	N	N/A	N	Lot associated with 303 North East Street, a Split-level house.
410 Sycamore Street	68	N/A	1960	N	N/A	N	Stone-clad Ranch part of the Sycamore Addition.
411 Sycamore Street	69	N/A	1960	N	N/A	N	Stone-clad Ranch part of the Sycamore Addition.
220 North East Street	70	N/A	1966	N	N/A	N	Ranch house clad in vinyl; new door.
202 North East Street	71	N/A	1930	N	N/A	N	This modest, gable-front structure has knee brace supports and rear addition.
160 North East Street	72	N/A	Vacant parcel	N	N/A	N	Vacant parcel on the west side of East Street
116/120 East Main Street	23, 24	N/A	1860/1940	Y	Y	N	Former Hayworth Hotel/McMullan Funeral Home. The brick side-gable building is identified as an I-House. A one-story storefront with recessed entry is attached to the west end.



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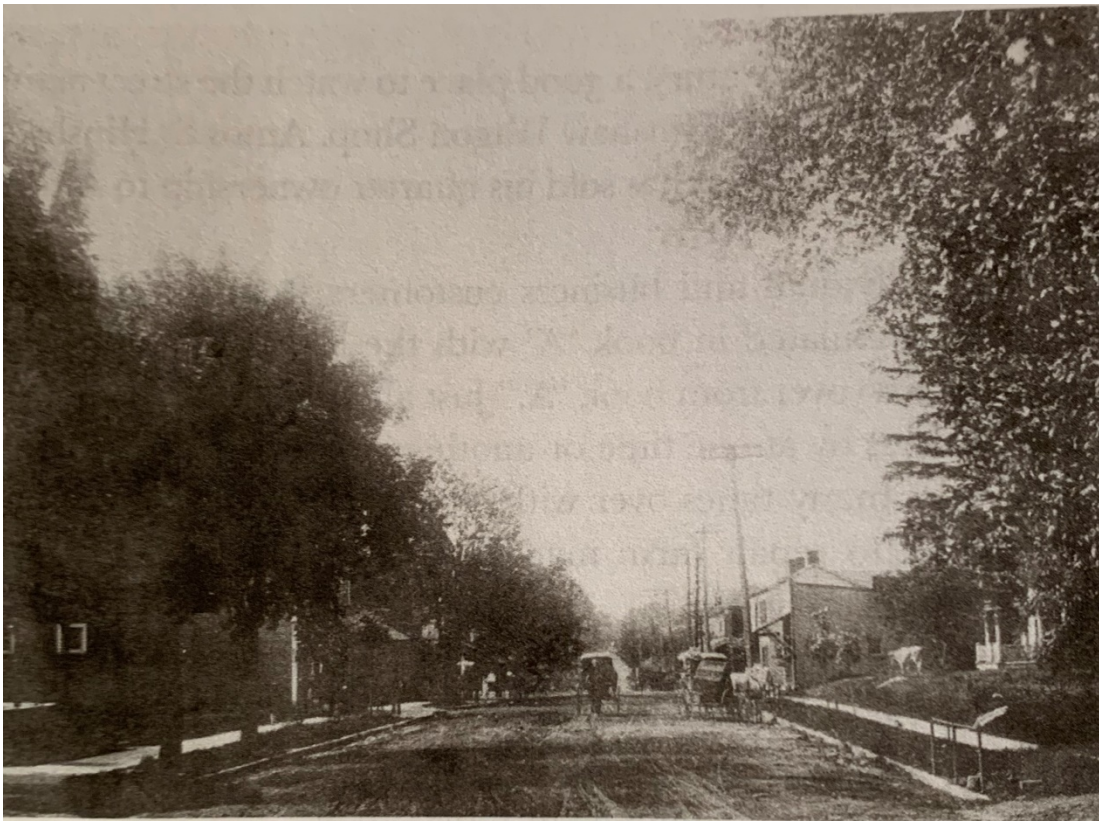
**ATTACHMENT C. Summary Tables**

<b>Table 1. Project Impacts</b>		
<b>Anticipated Relocations</b>	Westfield Historic District (National Register)	4 Buildings (4 units)
	Other relocations (Not listed in State or National Registers)	9 Buildings (10 units)
	<b>Total</b>	<b>13 Buildings (14 Units)</b>
<b>Anticipated Permanent Right-of-Way</b>	Westfield Historic District (National Register)	0.28 acre
	Stultz-Stanley House (State Register)	0.016 acre
	Other Right-of-Way (Not listed in State or National Registers)	1.96 acres
	<b>Total</b>	<b>2.256 acres</b>

<b>Table 2. Properties Demolished Since the IHSSI Survey (1991)</b>			
<b>Resource Name</b>	<b>Address</b>	<b>IHSSI No. † / Rating</b>	<b>Notes</b>
Wesleyan Methodist Church	211 North Union Street	057-667-26008 / Contributing	Within NRHP-listed Westfield Historic District boundaries. Demolished between 2000-2001. ‡ Parcel has been incorporated into Asa Bales Park.
House	302 East Main Street	057-464-24002 / Notable	Part of the Westfield IHSSI District. Demolished between 2001-2004.
House	320 East Main Street	057-464-24004 / Contributing	Part of the Westfield IHSSI District. Demolished between 2007-2008.
House	336 East Main Street	057-464-24006 / Contributing	Part of the Westfield IHSSI District. Demolished between 2009-2010.
House	402 East Main Street	057-464-24007 / Contributing	Part of the Westfield IHSSI District. Demolished between 2008-2009.
House	301 East Main Street	057-464-24008 / Notable	Part of the Westfield IHSSI District. Demolished between 2017-2018.
House	321 East Main Street	057-464-24010 / Contributing	Part of the Westfield IHSSI District. Demolished between 2017-2018.
House	335 East Main Street	057-464-24012 / Contributing	Part of the Westfield IHSSI District. Demolished between 2008-2009.
House	216 Penn Street	057-667-26011 / Contributing	Demolished between 2017-2018.
† Does not include 057-464-24003 & 057-464-24009, Non-Contributing vacant lots identified in the IHSSI District			
‡ Demolition estimates are based on aerial photographs available from Hamilton County GIS ( <a href="https://gis1.hamiltoncounty.in.gov/GeneralViewer/">https://gis1.hamiltoncounty.in.gov/GeneralViewer/</a> )			

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**ATTACHMENT D. Photographs**



Historic Photo 1. Looking south along Union Street, circa 1890s. From Tom Rumer, *A History of Westfield Indiana: The Promise of the Land* (Charleston, SC: The History Press, 2015), p. 96. For research purposes only.

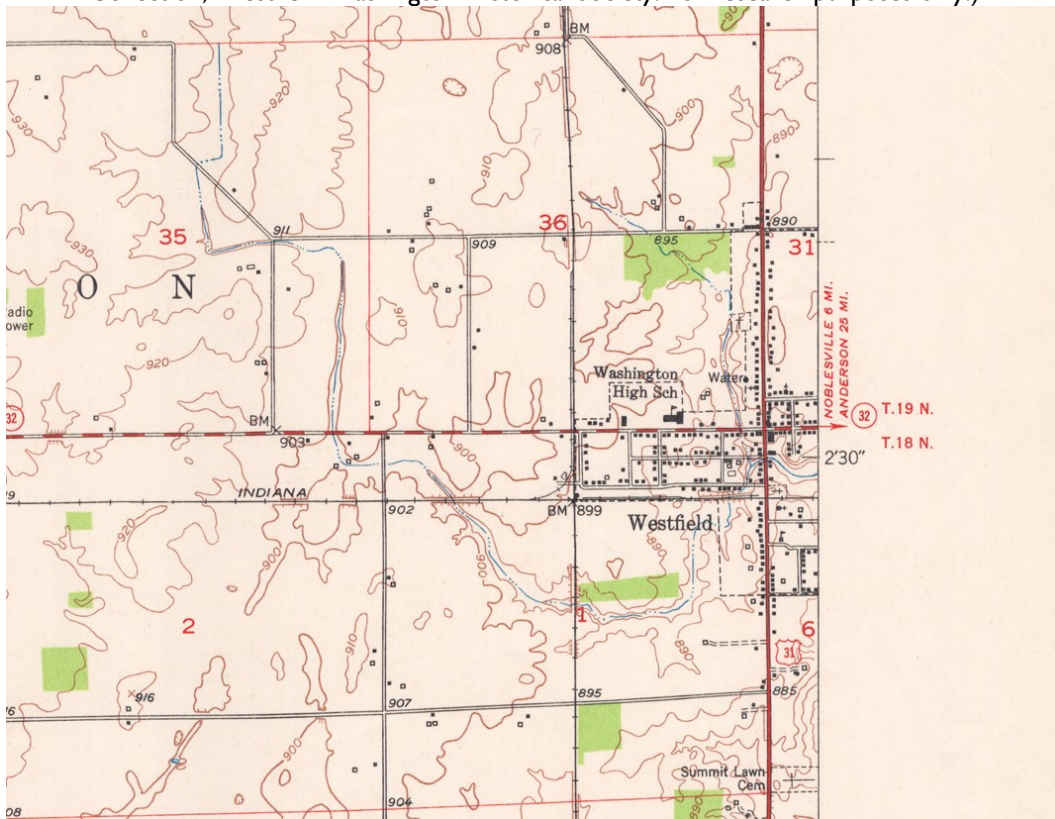


Historic Photo 2. Looking south along East Street toward SR 32, early 1900s. From the Camilla Allen Axelrod Collection, Westfield Washington Historical Society. For research purposes only.





Historic Photo 4. Paving of South Union Street for US 31 in the 1930s (From the Camilla Allen Axelrod Collection, Westfield Washington Historical Society. For research purposes only.)



Historic Photo 5. This Topographic Map of the Westfield Indiana quadrangle from 1953 shows US 31 running north-south along Union Street. From Topographic Maps, Indiana University Libraries. For research purposes only.





Historic Photo 6. By 1956, US 31 had been re-routed west of Union. From Hamilton County GIS. For research purposes only.



Historic Photo 7. By 2013, properties were being removed at Poplar and Shamrock Boulevard. From Hamilton County GIS. For research purposes only.





Modern Photo 1. 17601 Shamrock Boulevard, south and east elevations.



Modern Photo 2. 304 West Main Street, south elevation.





Modern Photo 3. 302 West Main Street, south elevation.



Modern Photo 4. 218 West Main Street, south and east elevation.





Modern Photo 5. 214 West Main Street, south and east elevation.



Modern Photo 6. 206 West Main Street, west and south elevation.





Modern Photo 7. 209 West Main Street, north and west elevations.



Modern Photo 8. View east across Popular Street to vacant right-of-way.





Modern Photo 9. 144 West Main Street, south elevation.



Modern Photo 10. 132 West Main Street, south and east elevations.





Modern Photo 11. 104 West Main Street, south elevation.



Modern Photo 12. 100 West Main Street (Hadley Park).





Modern Photo 13. 109 North Union Street, east elevation.



Modern Photo 14. 115 North Union Street, south and east elevations.





Modern Photo 15. 119/123 North Union Street, south and east elevations.



Modern Photo 16. 135 North Union Street, north and east elevations.





Modern Photo 17. Oscar Brown House, 136 North Union Street.



Modern Photo 18. 126 North Union Street, west elevation.





Modern Photo 19. 120 North Union Street, west elevation.



Modern Photo 20. 116 North Union Street, west elevation.





Modern Photo 21. Looking southeast to 110 to 104 North Union Street.



Modern Photo 22. Looking north to 100 North Union Street.





Modern Photo 23. South elevation of 110/112 East Main Street and 116/120 East Main Street.



Modern Photo 24. Detail view of portions of 110/112 East Main Street and 116/120 East Main Street





Modern Photo 25. 111 East Main Street, north elevation.



Modern Photo 26. 102 South Union Street (Erika's Place), west elevation.





Modern Photo 27. Looking north from near 132 South Union Street.



Modern Photo 28. Looking northeast to 132 and 144 South Union Street.





Modern Photo 29. View to Bridge No. 612 (NBI No.: 2900214).



Modern Photo 30. Looking south to 145 South Union Street, north elevation.





Modern Photo 31. Looking southwest to 101 and 103 South Union Street.



Modern Photo 32. Looking south the parking areas and 125 West Main Street.





Modern Photo 33. Looking south to 137 West Main Street.



Modern Photo 34. 201 West Main Street north elevation.





Modern Photo 35. 124 East Main Street, west and south elevations.



Modern Photo 36. 136 East Main Street, south elevation.





Modern Photo 37. 202 East Main Street, south elevation.



Modern Photo 38. 212 East Main Street, south elevation.





Modern Photo 39. 220 East Main Street, west and south elevation.



Modern Photo 40. 230 East Main Street, south elevation.





Modern Photo 41. 100 Cherry Street, looking southeast.



Modern Photo 42. 231 East Main Street, north elevation.





Modern Photo 43. 221 East Main Street, north elevation.



Modern Photo 44. 215 East Main Street, north elevation.





Modern Photo 45. 211 East Main Street.



Modern Photo 46. 210 East Main Street, north elevation.





Modern Photo 47. 133 East Main Street, looking southeast.



Modern Photo 48. 320 East Main Street, south elevation.





Modern Photo 49. 328 East Main Street, south and east elevations.



Modern Photo 50. Lot at 336 East Main Street.





Modern Photo 51. Lot at 402 and 410 East Main Street.



Modern Photo 52. Looking north to 420 East Main Street.





Modern Photo 53. Looking east, lot at 105 Hillcrest is on the right.



Modern Photo 54. 102 Hillcrest Drive, west and south elevations.





Modern Photo 55. 515 East Main Street, west and north elevations.



Modern Photo 56. 511 East Main Street, west and north elevations.





Modern Photo 57. Gurley Street, looking south from Main Street.



Modern Photo 58. 411 East Main Street, north elevation.





Modern Photo 59. Lot at 335 East Main Street.



Modern Photo 60. 325 East Main Street, north and east elevations.





Modern Photo 61. 518 East Main Street, south elevation.



Modern Photo 62. Looking south to Timberbrook Drive.





Modern Photo 63. 111 North East Street, south and east elevations.



Modern Photo 64. 335 Penn Street, east elevation.





Modern Photo 65. 336 Penn Street, south and east elevations.



Modern Photo 66. View to North Street, 351 North Street.





Modern Photo 67. 307 East Street and associated parcels.



Modern Photo 68. 410 Sycamore Street.





Modern Photo 69. 411 Sycamore Street.



Modern Photo 70. 220 East Street, west elevation.





Modern Photo 71. 202 East Street, west and south elevations.



Modern Photo 72. Looking south along East Street, lot at 160 East Street is on the left.

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**ATTACHMENT E. Alternatives Analysis**



# Alternative Analysis

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## State Road 32 Westfield Reconstruction Westfield, Hamilton County, Indiana Des. No. 1801731

### Prepared for:

Indiana Department of Transportation  
642 Government Center North  
100 North Senate Avenue  
Indianapolis, Indiana 46204

City of Westfield  
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### Prepared by:

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**November 9, 2020**

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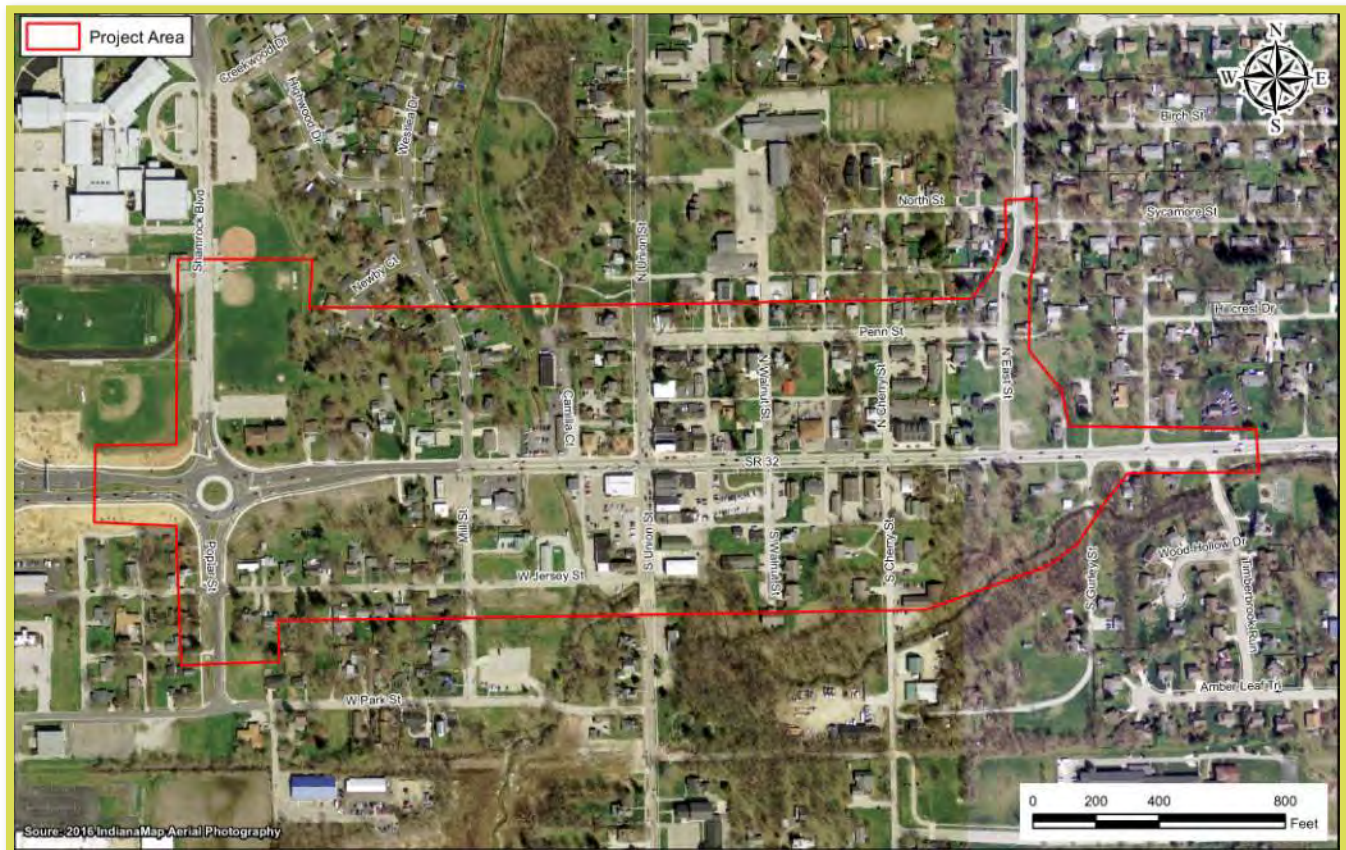
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# 1. Introduction

The City of Westfield, with funding and administrative oversight from the Indiana Department of Transportation (INDOT), proposes to reconstruct State Road (SR) 32 in downtown Westfield from Poplar Street to just east of Timberbrook Run. The proposed project area is roughly bound by Poplar Street to the west, Timberbrook Run to the east, Jersey Street to the south, and Penn Street to the north. The project area can be seen below in **Figure 1** and in **Appendix B**. As the project is receiving funding from the State of Indiana, a state-sponsored environmental assessment will be completed. American Structurepoint, Inc. is advancing this documentation on behalf of the City of Westfield and INDOT.

The purpose of this Alternatives Analysis is to present the project's proposed action and the alternatives under consideration, discuss the results of the analysis, and identify the preferred alternative.



### Figure 1: Project Area

## 1.1 Project Funding

This proposed project is being developed by the City of Westfield, in partnership with INDOT, and was anticipated to receive funding from the Federal Highway Administration (FHWA). Due to the anticipated involvement of federal funds, an environmental assessment (EA) was being developed pursuant to the requirements of the National Environmental Policy Act (NEPA), outlined in 40 CFR 1502.22(b). Additionally, compliance with Section 106 of the National Historic Preservation Act (NHPA), which requires federal agencies to take into account the effects of their undertakings on historic and archaeological properties, was also required. The Section 106 process was initiated and historic properties were identified that were either eligible for listing or listed on the National Register of Historic Places (NRHP).

Since the initiation of the project, including the Section 106 process, federal funding has been removed from the project, and funding of the project is now anticipated to be met through a combination of local and state funds. Due to receiving

funding from the State of Indiana, the project is required to follow the Indiana Historic Preservation and Archaeology Act (IHPAA) outlined in Indiana Code (IC) 14-21-1. The effects on the already identified eligible for listing or listed on the NRHP properties will continue to be considered in the evaluation of alternatives. Additionally, this project is excluded from meeting the requirements of NEPA and instead must meet the requirements of the State Environmental Policy Act (SEPA), outlined in 327 Indiana Administrative Code (IAC) 11. A state-sponsored EA will be prepared for this project to meet the requirements of SEPA.

## 1.2 Purpose and Need

The purpose of the proposed project is to improve corridor mobility along SR 32 through the downtown Westfield area for both motorists and pedestrians alike. Currently, the existing corridor does not provide a safe traveling environment for motorists or pedestrians, as the existing roadway is congested.

The need is derived from existing field observations, which include extensive queuing on SR 32 both east and west of Union Street. As a result of the queue, traffic flow is impeded at the numerous drives and intersecting roads along the corridor. In particular, the Poplar Street/Shamrock Boulevard roundabout is negatively impacted when slowed or stopped vehicles on SR 32 back up into the roundabout and prevent other vehicles from entering the roundabout. This restricts access from other directions trying to reach the north leg of the roundabout that leads to Riverview Health Hospital and the Westfield Intermediate and Middle Schools. Due to projected growth in the community, as well as planned developments in the area, the existing traffic congestion is expected to increase in the future.

### 1.2.1 Traffic Analysis

A *Traffic Operations Analysis* (**Appendix C**) was completed by American Structurepoint, Inc. on May 30, 2019 to evaluate the existing and future traffic operating conditions for the SR 32 study corridor. The standard parameter used to evaluate traffic operating conditions is referred to as the level-of-service (LOS). There are six LOS (A through F) which relate to driving conditions from best to worst, respectively. LOS for signalized and unsignalized (stop-control and roundabout) intersections is defined in terms of control delay per vehicle, which is a direct correlation to driver discomfort, frustration, fuel consumption, and lost travel time (**Table 1**). The peak hours for this project were defined as 7:00 AM to 9:00 AM for the AM peak hours and 4:00 PM to 6:00 PM for the PM peak hours. In general for the analysis, the operating conditions of intersections were considered to be acceptable if found to operate as LOS D or better for the overall intersection, with no approach operating worse than LOS E.

Table 1: Level of Service		
LOS	Delay per Vehicle (seconds)	
	Signalized/Roundabout Intersections	Unsignalized Intersections
A	≤ 10	≤ 10
B	> 10 and ≤ 20	> 10 and ≤ 15
C	> 20 and ≤ 35	> 15 and ≤ 25
D	> 35 and ≤ 55	> 25 and ≤ 35
E	> 55 and ≤ 80	> 35 and ≤ 50
F	> 80	> 50

Queue lengths were evaluated for all approaches to each intersection to determine the potential impact that queueing at each intersection has on other nearby intersections. The standard parameter used for measuring queueing is the 95<sup>th</sup> percentile queue length. The 95<sup>th</sup> percentile queue length encapsulates the traffic conditions occurring 95 percent of the time, and removes the 5 percent of occurrences that are considered to be rare. The 95<sup>th</sup> percentile queue length was compared to the distance between intersections to determine if the queue length would cause back up into the adjacent intersection. The 95<sup>th</sup> percentile queue length was compared to the distances listed in **Table 2** below. The eastbound 95<sup>th</sup> percentile queue length at Union Street was considered to



be an issue when it would begin to affect the Poplar Street approach. This is due to the impact the queue length would have on the Poplar Street roundabout resulting in a restriction of access to Riverview Health Hospital and the Westfield Intermediate and Middle Schools. The westbound 95<sup>th</sup> percentile queue length at Union Street was considered to be an issue when it would begin to affect Cherry Street resulting in two intersecting streets being blocked by the back up.

Table 2: Distance Between Intersections		
Location		Distance (ft)
From Union Street west to:	Westlea Drive/Mill Street	515
	End of Poplar Street Approach	800
	Inside Poplar Street RAB	1200
From Union Street east to:	Walnut Street	330
	Cherry Street	715
	East Street	1,085

**Table 3** below summarizes the capacity analysis results (LOS, vehicle delay, and 95<sup>th</sup> percentile queue length) for the SR 32 and Union Street intersection. The analysis was completed for the existing conditions at the signalized intersection without any improvements to SR 32.

Table 3: Traffic Analysis Results for SR 32 & Union Street								
Analysis Year	Scenario	Peak Hour	Parameter	Approach (SR 32 & Union Street)				
				NB	SB	EB	WB	Overall
2019	Existing	AM	LOS	E	E	B	D	D
			Delay (sec/veh)	62.6	72.6	19.8	50.6	44.0
			Queue Length (ft)	225	275	475	975	--
		PM	LOS	E	D	C	C	C
			Delay (sec/veh)	66.8	51.0	27.6	22.7	34.2
			Queue Length (ft)	300	200	900	550	--
2022 (Opening Year)	Existing	AM	LOS	E	E	C	F	E
			Delay (sec/veh)	61.7	75.8	24.5	81.0	59.0
			Queue Length (ft)	225	300	500	1,000	--
		PM	LOS	E	D	C	C	D
			Delay (sec/veh)	74.1	54.9	32.8	26.1	38.5
			Queue Length (ft)	375	250	1,100	625	--
2042 (Design Year)	Existing	AM	LOS	F	F	D	F	F
			Delay (sec/veh)	111.5	140.9	39.9	109.1	89.4
			Queue Length (ft)	375	475	650	1,475	--
		PM	LOS	F	D	F	D	E
			Delay (sec/veh)	86.7	53.3	82.1	38.5	65.8
			Queue Length (ft)	450	250	1,375	875	--

Based on the capacity analysis results, the SR 32 & Union Street intersection is expected to operate at LOS D in the 2019 AM peak hour and LOS C in the 2019 PM peak hour; however, the 95<sup>th</sup> percentile queue length exceeds 950-feet for the westbound approach in the AM peak hour and 900-feet for the eastbound approach in the PM peak hour. Due to the extensive queuing on SR 32 at Union Street, traffic flow is impeded at other driveways and major intersections along the corridor. In particular, the Poplar Street/Shamrock Boulevard roundabout is negatively impacted when slowed or stopped vehicles on SR 32 create a gridlock and prevent other vehicles from entering the roundabout. Slowed/stopped traffic through a roundabout compromises the safety of the intersection as driver expectations change and typical gaps in traffic are no longer available.

By the projected Opening Year (2022) of the project, new developments in the vicinity of downtown Westfield are anticipated to occur. The developments are anticipated to increase traffic volumes on SR 32 through the study corridor, which is expected to worsen the aforementioned conditions. The expected overall LOS of the SR 32 & Union Street intersection projected for the Opening Year of 2022 under existing conditions is LOS E in the AM peak hour and LOS D in the PM peak hour. The traffic analysis indicates several movements at the SR 32 & Union Street intersection will operate at LOS E or worse, and the queue lengths exceed 1,000-feet for the respective peak directions. This results in vehicle congestion that backs up to just west of East Street for westbound traffic during the AM peak hour, and congestion that occurs in the exit leg of the Poplar Street roundabout for eastbound traffic during the PM peak hour.

By the Design Year (2042) of the project, the overall LOS of the SR 32 & Union Street intersection under existing conditions is expected to be LOS F in the AM peak hour and LOS E for the PM peak hour. The analysis indicates multiple approaches for the intersection operate at LOS F in the AM and PM peak hours. For the AM peak hour, three out of four approaches are operating at a LOS F with the westbound movement having a queue length of 1,475-feet. This queue length would cause vehicle congestion that backs up almost to Hillcrest Drive. The PM peak hour has two out of four approaches operating at a LOS F with the eastbound approach having a queue length of 1,375-feet. This queue length would cause vehicle congestion that backs up into the Poplar Street roundabout.

**Table 4** below summarizes the capacity analysis results (LOS, vehicle delay, and 95<sup>th</sup> percentile queue length) for the SR 32 & East Street intersection. The analysis was completed for the existing conditions at the one-way stop-controlled intersection without any improvements to SR 32.

Table 4: Traffic Analysis Results for SR 32 & East Street								
Analysis Year	Scenario	Peak Hour	Parameter	Approach (SR 32 & East Street)				
				NB	SB	EB	WB	Overall
2019	Existing	AM	LOS		D	A	A	A
			Delay (sec/veh)		32.5	0.9	0.0	1.8
			Queue Length (ft)		50	0	0	--
		PM	LOS		E	A	A	A
			Delay (sec/veh)		40.2	0.2	1.0	1.0
			Queue Length (ft)		25	0	0	--
2022 (Opening Year)	Existing	AM	LOS		E	A	A	A
			Delay (sec/veh)		42.2	0.9	0.0	2.2
			Queue Length (ft)		50	0	0	--
		PM	LOS		F	A	A	A
			Delay (sec/veh)		63.4	0.2	0.0	1.6
			Queue Length (ft)		50	0	0	--
2042 (Design Year)	Existing	AM	LOS		F	A	A	A
			Delay (sec/veh)		121.7	1.1	0.0	5.7
			Queue Length (ft)		125	25	0	--
		PM	LOS		F	A	A	A
			Delay (sec/veh)		239.2	0.3	0.0	5.6
			Queue Length (ft)		125	0	0	--

Based on the capacity analysis results, the intersection of SR 32 & East Street under existing conditions is expected to operate at overall LOS A during the 2019 AM and PM peak hours; however, the southbound movement is operating at LOS D in the AM peak hour and LOS E during the PM peak hour. Southbound traffic approaching the SR 32 & East Street intersection is delayed when attempting to turn onto SR 32 due to congestion on SR 32 that does not provide a gap in traffic for turns, as well as can block the intersection preventing any turns.



By the projected Opening Year (2022) of the project, the southbound movement of the SR 32 & East Street intersection under existing conditions is expected to operate at LOS E during the AM peak hour and LOS F during the PM peak hour. The additional traffic volume along SR 32 decreases the opportunity for turn movements from East Street onto SR 32. The additional congestion affecting queue lengths causes vehicles on SR 32 to back up to just west of East Street in the AM peak hour. This causes additional delay in vehicles turning from East Street.

By the Design Year (2042) of the project, the southbound movement of the SR 32 & East Street intersection under existing conditions is expected to operate at LOS F in the AM and PM peak hours. In the AM peak hour, each vehicle is delayed by over two minutes when attempting to make a turning movement onto SR 32. In the PM peak hour, this delay doubles and each vehicle is delayed by over four minutes when attempting to make a turning movement onto SR 32.

### 1.3 Anticipated Future Growth

Recently, Westfield has been undergoing a revitalization effort that has increased tourism and economic development. In 2014 the Grand Park Sports Complex opened in Westfield, which is an over 400-acre sports campus that welcomes 2.5 million visitors per year. This has spurred over 1.5 billion dollars in economic development for Westfield. Grand Park Sports Complex has additional undeveloped properties available for future development that will further promote additional growth. The increased tourism and economic development has significantly increased transportation demands overall in Westfield.

Additionally, there are currently several planned developments and improvement projects in downtown Westfield that are in various stages of completion. These projects are the Grand Junction Park and Plaza, Union Square at Grand Junction, and the Jersey Street Extension. Each of the projects are generally located in the vicinity of the SR 32 corridor through downtown Westfield, but are independent of the SR 32 Westfield Reconstruction project (**Figure 2, Appendix B**). These projects are anticipated to further increase existing traffic congestion issues, as well as significantly change the existing conditions of the SR 32 corridor as these projects develop.

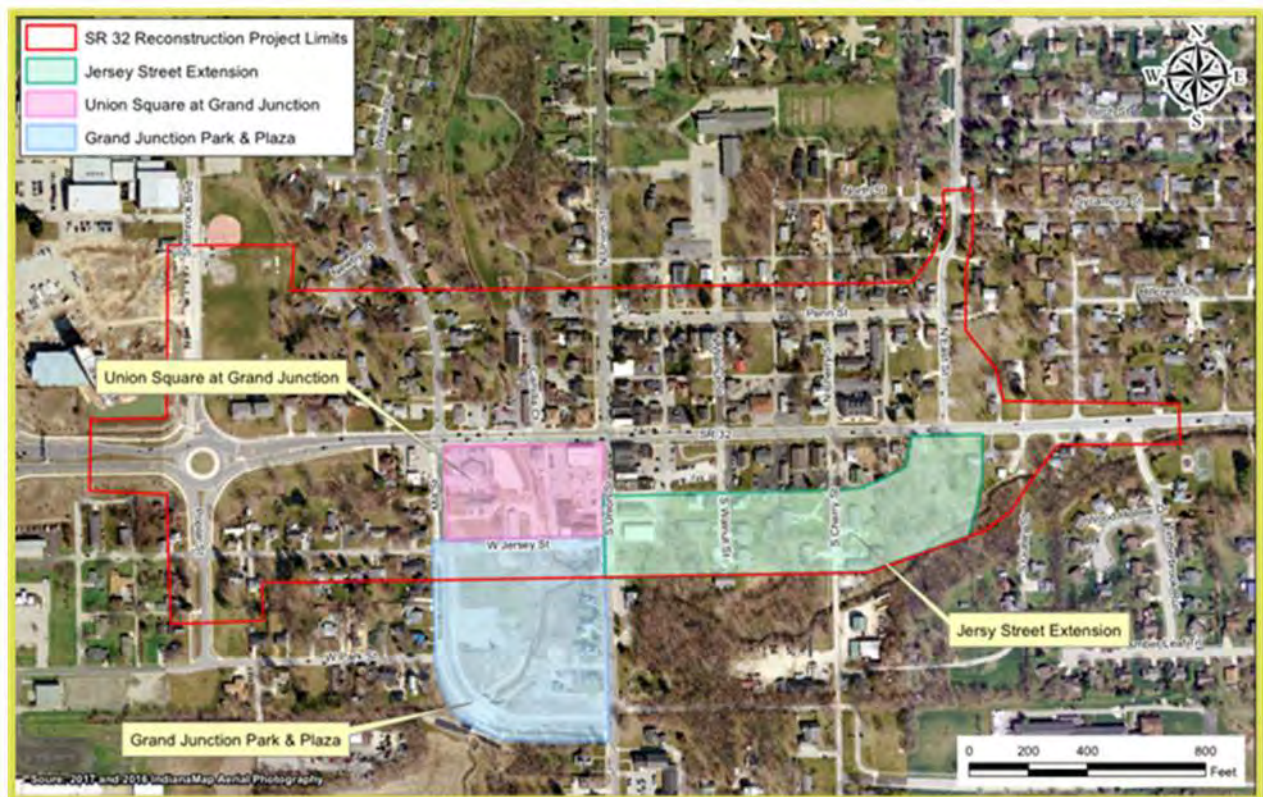


Figure 2: Planned Developments

### 1.3.1 Grand Junction Park and Plaza

The Grand Junction Park and Plaza is a 6-acre park located one block south of SR 32 that is currently under construction. The park is bounded by Jersey Street, Mill Street, and Union Street. The park is planned to include an outdoor performance venue, café, children's play area, and a trailhead pavilion. In the northwest corner of the park is the Plaza, which will become a central gathering place for festivals, markets, and other events hosted by the city throughout the year. The portion of Jersey Street adjacent to the park, between Mill Street and Union Street, is incorporated into the park plan with intentions to close that portion of the street to act as a plaza for events. The park plan also includes landscaping on both sides of the street. Improvements to Jersey Street between Mill Street and Union Street were incorporated into the park construction plans and are currently underway. As part of the Jersey Street improvements, the crossing of Grassy Branch Creek will be replaced. The current culvert is reaching the end of its design life. The new structure will be in conflict with the Former Town Hall Building/Fire Station that sits on the northeast corner of Jersey and Union. The Former Town Hall Building/Fire Station is listed as a contributing resource to the NRHP listed Westfield Historic District. The Former Town Hall Building/Fire Station has been owned by the city since it was originally constructed. A portion of the building is currently being used for equipment storage, while the rest of the building has been unoccupied for over five years. Since the conception of the Grand Junction Park and Plaza in 2008, the Former Town Hall Building/Fire Station has been incorporated into the redevelopment plan, which was emphasized by the purchase of adjacent properties in 2011 and 2015. The Grand Junction Park and Plaza is funded by the City of Westfield and designed by Land Collective. The project was conceived in 2008 with preliminary engineering funding that started in 2015. The construction funding plan was approved in the spring of 2019 with park construction beginning in 2019. Grand Junction Park and Plaza is expected to be completed in 2021.

### 1.3.2 Union Square at Grand Junction (Old Town Design Group Development)

Old Town Design Group is developing a 25 million dollar mixed-use complex along the south side of SR 32 between Union Street and Mill Street and north of Grand Junction Park and Plaza. The development is intended to be named Union Square at Grand Junction and would include: apartments, condos, shops, and restaurants. At this time, Old Town Design Group is negotiating agreements to purchase properties within the block of the planned development. There are five parcels that are owned by the City of Westfield that are within the footprint of the planned development: one parcel grass lot at the northeast corner of Mill Street and Jersey Street, three parcels along Union Street that serve as parking lots, and one parcel that the Former Town Hall Building/Fire Station sits on. As part of the planned development, the City of Westfield would transition those parcels as part of a development agreement. The Former Town Hall Building/Fire Station and two of the other parcels were already part of redevelopment plans by the city for the Grand Junction Park and Plaza (referenced in **Section 1.3.1**). There is discussion between the City of Westfield and Old Town Design Group on the possibility of incorporating a public parking garage into the Union Square development as well. The Union Square at Grand Junction development is funded by Old Town Design Group. Discussions between Old Town Design Group and the City of Westfield began in 2017 with the development officially announced in the spring of 2019. Union Square at Grand Junction was expected to begin construction in 2019 with expected completion in 2021.

### 1.3.3 Jersey Street Extension

Jersey Street currently starts at Maple Street with one travel lane in each direction and continues east for 0.34 mile until it terminates at Union Street. The portion of Jersey Street from Mill Street to where it connects to Union Street is being improved under the Grand Junction Park and Plaza project. East Street is a north corridor leading out from downtown Westfield and where current traffic traveling through downtown becomes congested. Currently, vehicles must travel farther west along SR 32 from East Street to Union Street, a south corridor that connects to the residential streets south of SR 32. The purpose of the Jersey Street Extension project is to provide increased access and an alternative east/west travel corridor through the southern portion of downtown Westfield.



Jersey Street currently terminates at Union Street where the downtown commercial area, proposed Grand Junction Park and Plaza, and residential area meet. Immediately south of SR 32, the east-west mobility is limited; this results in traffic on Jersey Street being required to go north via intersecting roads to gain access to SR 32- typically the signalized Union Street intersection. Currently, local traffic must travel north to SR 32 to reach an east-west corridor that leads out of downtown. Once Grand Junction Park and Plaza is completed, traffic from the east and north, accessing the Plaza and other portions of the park, will travel through downtown Westfield along SR 32 before turning south in the direction of the park. The completion of Union Square at Grand Junction will also increase traffic through the area. The extension would provide increased direct access to the southern portion of downtown Westfield including Grand Junction Park and Plaza and residential houses. With this extension, the overall roadway connectivity is improved within the area. Traffic will also be drawn away from the congested portions of SR 32 by providing residents and park visitors a complete east/west corridor. This Jersey Street Extension is funded by the City of Westfield. The project was conceived in the spring of 2017 and the funding was approved in the fall of 2018. The Jersey Street extension is anticipated to begin construction in 2021 with anticipated completion in 2022.

## 1.4 Existing Conditions

This section of SR 32 within the project area is a principal arterial that runs east/west through downtown Westfield. The existing typical roadway section of SR 32 is two 12-foot wide travel lanes (one eastbound, one westbound) with on-street parking and 11-foot wide left turn lanes at the intersection with Union Street. Existing sidewalks along SR 32 vary between 4-foot wide to 15-foot wide sections with the widest at the intersection with Union Street. The sidewalks are separated from travel lanes by 6-inch curbs. The current speed limit on SR 32 is 30 miles per hour (mph). There are six intersecting roadways (Poplar, Mill, Union, Walnut, Cherry, and East) along SR 32 within the project limits. Based on observations of existing conditions, traffic congestion at the intersections of SR 32 with Union Street and with East Street are affecting traffic flow along SR 32 that is then resulting in issues at the other intersecting roadways.

The existing typical roadway section of Union Street is two 11-foot wide travel lanes (one southbound, one northbound) with on-street parking along the northbound lane and 11-foot wide left turn lanes in each direction. Existing sidewalks along Union Street vary between 4-foot to 14-foot wide sections with the widest at the intersection with SR 32. The sidewalks are separated from travel lanes by 6-inch curbs. The SR 32 and Union Street intersection is signalized with dedicated left-turn lanes provided on all approaches; however, the vehicular storage length provided is limited to only two to three vehicles (50-feet). The left-turn phasing at the signal was recently modified near the end of 2018 to provide protected-permissive left turns for all left-turn movements. Due to existing peak hour congestion along SR 32, most left turns onto SR 32 occur at Union Street. Left turn volumes at the adjacent unsignalized intersection are low during the peak hours, which indicates that gaps in traffic are not available and forces drivers to use Union Street.

The existing typical roadway section of East Street is two 10-foot wide travel lanes (one southbound, one northbound) with a 2-foot wide curb and gutter along the southbound lane and a 1-foot wide paved shoulder along the northbound lane. A 4-foot wide sidewalk exists along the southbound lane. East Street provides a major north corridor, in addition to Union Street, from downtown Westfield. The current speed limit on East Street is 20 mph, but has a reduced speed limit of 15 mph north of Penn Street through a tight S-curve. This S-curve is a substandard horizontal curve that has limited sight distances for those moving along SR 32 as well as eastbound drivers on Penn Street moving onto SR 32. The intersection of SR 32 and East Street has a one-way stop control for the southbound approach along East Street and no turn lanes are provided at any of the approaches. Currently, southbound traffic approaching the SR 32 and East Street intersection is delayed when attempting to turn onto SR 32 due to congestion throughout the SR 32 corridor. This also occurs at the other intersecting roadways along SR 32; however, as stated above the peak hour congestion along SR 32 forces drivers to use Union Street for turn movements onto SR 32.

## 2. Proposed Action

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The proposed action (Alternative A) involves widening and reconstructing SR 32 from just east of the Poplar Street roundabout to just east of Timberbrook Run (**Figure 3, Appendix B**). Outside of the boundaries of the Westfield Historic District and the Stultz-Stanley House, the existing 2-lane section of SR 32 would be reconstructed to consist of four 11-foot wide travel lanes (two westbound, two eastbound), with a raised 13-foot wide median, curb and gutter, and 8-foot wide sidewalks separated by 6-foot wide grass buffers on both sides of the roadway. At the intersection of SR 32 with Westlea Drive/Mill Street the raised median would transition to an 11-foot wide protected left turn lane for eastbound traffic to access Westlea Drive to the north. An 11-foot wide dedicated right turn lane would be provided for eastbound traffic to access Mill Street. Along SR 32 left turns would be restricted to Westlea Drive/Mill Street and Union Street. This reconstruction would result in widening the roadway to the south by approximately 25-feet. Along SR 32 between Walnut Street and Cherry Street a crosswalk with a pedestrian refuge island is proposed to provide an alternative crossing option for pedestrians between Union Street and East Street.

Throughout the project area the existing overhead utilities along the south side of SR 32 will be relocated underground to be underneath the sidewalk. The existing overhead utilities consist of electrical transmission and distribution cables in addition to multiple communications cables and their associated wooden power poles. Each of the utilities will require adequate separation from each other so maintenance and repairs can occur when necessary. Typical minimum separation is 3 to 5-feet depending on individual utility requirements. In addition to requiring enough room to relocate facilities within the right of way, a minimum of 10-foot-by-10-foot wide areas would be required as a dedicated easement for above ground pad mounted equipment. Due to the area needed for utility relocation, an anticipated utility corridor that is 15-feet wide extending from the curb line is accounted for along the south side of SR 32.

In front of the Stultz-Stanley House, SR 32 would be shifted north by approximately 34-feet and the typical section of SR 32 would remain the same with the exception of no 6-foot wide grass buffer along the south side of the roadway separating the sidewalk from the roadway. Although the roadway would be shifted north, it would still need to be widened to the south. Due to the widening south, the sidewalk would conflict with the existing stairs and front yard of the Stultz-Stanley House. Due to a significant difference in elevation between the yard in front of the Stultz-Stanley House and the existing roadway, a retaining wall would be constructed in front of the house to stabilize the current yard and avoid compromising the structure. Due to the area needed to provide the 15-foot wide utility corridor, the top of the stairs and the edge of the retaining wall would be approximately 6-feet, 8-inches from the edge of the front porch steps to the house.

Within the boundaries of the Westfield Historic District, SR 32 would be reconstructed to consist of four 11-foot wide travel lanes, an 11-foot wide turn lane, a 2-foot wide raised center curb with 1-foot wide curb offset, curb and gutter, and 8-foot wide sidewalks separated by 6-foot wide buffers on both sides of the roadway. This would result in widening SR 32 to the south by approximately 25-feet.

The intersection of SR 32 and East Street will be reconstructed to a roundabout with four 11-foot wide travel lanes (two westbound, two eastbound) with 8-foot wide sidewalks separated by 6-foot wide grass buffers on all sides. This will provide an opportunity for U-turn movements at each end of the project area to compensate for the restricted left turns throughout the roadway. Pedestrian crosswalks and refuge islands will be constructed at each leg of the roundabout. East of the roundabout and extending to just east of Timberbrook Run, SR 32 would be reconstructed to consist of four 11-foot wide travel lanes (two westbound, two eastbound). The beginning of a southern leg of the roundabout will be constructed as a connection to the anticipated to be built Jersey Street Extension. North of the roundabout, East Street will be reconstructed to consist of two 11-foot wide travel lanes (one northbound, one southbound) with 6-foot wide sidewalks adjacent to the curb and gutter on the west side of the roadway. East Street will be realigned to provide the appropriate transition into the roundabout as well as straighten out the existing S-curve along East Street, north of Penn Street.



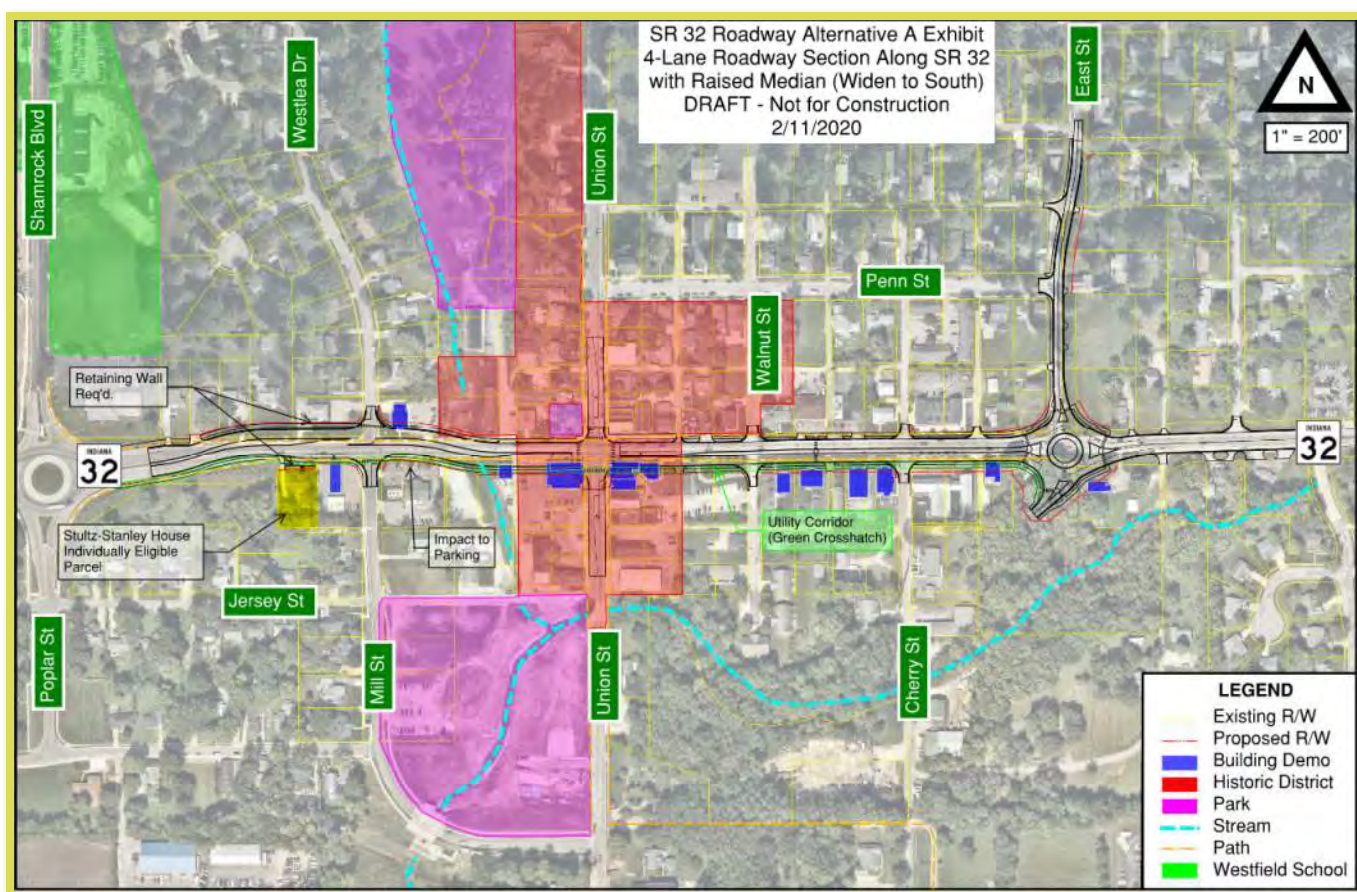


Figure 3: Alternative A (Proposed Action)

### 3. Other Alternatives

During project development with INDOT, the City of Westfield, and project stakeholders, two additional preliminary build alternatives (Alternatives B and C) were developed in addition to the proposed action (Alternative A). After public comment and further evaluation of eligible for listing or listed NRHP resources, an additional three build alternatives (Alternatives A-1, A-2, and A-3) were developed. Two alternatives (Alternatives D and E) were developed that would completely avoid downtown Westfield and the impacts to the area's resources. A total of eight alternatives were developed to be considered:

- Alternative A: Widen SR 32 (Proposed Action discussed in **Section 2**)
- Alternative A-1: Reduced Typical Section through Historic District and Closure of Union Street
- Alternative A-2: Widen SR 32 with Right-In/Right-Out At Union Street
- Alternative A-3: Widen SR 32 Avoidance of Stultz-Stanley House
- Alternative B: One-Way Pair SR 32 and Penn Street
- Alternative C: One-Way Pair SR 32 and Jersey Street
- Alternative D: Bypass
- Alternative E: No Build (Do-Nothing)

#### 3.1. Alternatives Eliminated From Further Consideration

The alternatives developed were evaluated to determine if they meet the purpose and need of the project. If they did not meet the purpose and need, then they were eliminated from further consideration. Two alternatives, Alternative D and E, were determined to not meet the purpose and need and were eliminated from further consideration.

### 3.1.1 Alternative D: Bypass

This alternative would leave the existing SR 32 roadway as it currently exists. No reconstruction of the roadway to meet the project's purpose and need would be implemented. This alternative would turn over control of SR 32 to the City of Westfield and direct truck traffic onto local roads (for example, directing truck traffic to SR 38, SR 37, or I-69 depending on the intended direction of travel).

Currently, traffic is the most congested during the peak periods of weekdays (7:00 AM – 9:00 AM, 4:00 PM – 6:00 PM). Based on data from the traffic analysis, the percentage of truck traffic is approximately 2% during peak hours. Due to the small percentage of truck traffic, redirecting the truck traffic away from SR 32 would not address the overall traffic congestion issues during the peak hours. Additionally, in a letter dated July 15, 2019 (**Appendix D**) the City of Westfield stated that it is opposed to decommissioning SR 32 through the downtown area. The City has not budgeted for the long-term maintenance of the roadway, and relinquishment would burden taxpayers, as well as result in other vital infrastructure projects being delayed or cancelled to cover the long-term maintenance costs of the relinquishment of SR 32 through downtown Westfield.

A memo from the INDOT Corridor Development Office (**Appendix D**) states that an alternative that decommissions SR 32 and redirects truck traffic is not reasonable or feasible: According to the memo, *"...the interchange of US 31 and SR 32 forms a major connection point via the US 31 freeway to I-465 at the west end of the SR 32 corridor. Traffic data shows that US 31 at SR 32 is a destination point in addition to downtown Westfield itself. Of great significance is the fact that INDOT and FHWA invested millions of dollars into the US 31 Hamilton County freeway and the interchange at SR 32 to provide improved safety and traffic operations, access, connectivity and increased opportunities for economic development. Disallowing the traveling public from using SR 32 via a road transfer or any other means would call into question the prior investment and the environmental study on which the US 31 freeway was founded...Even if such an agreement were to be reached and truck traffic routed on another road, the high passenger car traffic volumes would still use the corridor as it is the shortest path to the US 31 freeway..."* Decommissioning SR 32 would not address the need of the project, to provide an efficient traveling environment for motorists or pedestrians, as the existing roadway is congested, nor does it address the purpose of the project, to improve corridor mobility along SR 32 through the downtown Westfield area for both motorists and pedestrians. Alternative D would not address any of the established needs of the project; therefore, it was eliminated from further consideration.

### 3.1.2 Alternative E: No Build (Do-Nothing)

This alternative would leave the existing SR 32 roadway as it currently exists. No reconstruction of the roadway to meet the project's purpose and need would be implemented. The existing roadway would continue to be congested further impeding traffic flow at numerous drives and intersection along the corridor.

The SR 32 & Union Street intersection under existing conditions is expected to operate at LOS F during the design year (2042) with 95 percentile queue lengths exceeding 1,350-feet in both directions along SR 32. The queuing on the eastbound approach specifically results in backups into the Poplar Street roundabout and impacts access to the Riverview Health Hospital and the Westfield Intermediate and Middle Schools. This would further decrease the corridor mobility through the project area. Alternative E would not address any of the established needs of the project; therefore, it was eliminated from further consideration, but is provided in the analysis for comparison between the build alternatives.

## 3.2. Alternative A-1: Reduced Typical Section through Historic District and Closure of Union Street

This alternative involves widening and reconstructing SR 32 from just east of the Poplar Street roundabout to just east of Timberbrook Run, as well as closing access to Union Street from SR 32 (**Figure 4, Appendix B**). This alternative would maintain the same typical section as Alternative A outside the limits of the Westfield Historic District. Within the



boundaries of the Westfield Historic District, SR 32 would be reconstructed to consist of four 11-foot wide travel lanes, curb and gutter, and 6-foot wide to 8-foot wide sidewalks on both sides of the roadway. The raised median and left turn lanes as proposed in Alternative A would be removed. At the intersection of SR 32 and Union Street, no access would be allowed to Union Street from SR 32. Vehicle access on Union Street would be terminated approximately 200-feet north and south of SR 32 at the nearby alleys where cul-de-sacs would be created to allow vehicle turn-arounds, as well as access for emergency vehicles. Instead of the current traffic signal at the intersection, a protected pedestrian crossing with signal would be installed. With the closure of Union Street access from SR 32, the typical section through the Westfield Historic District for this alternative is reduced to the minimum amount to facilitate the required traffic capacity and comply with acceptable design standards. This typical section, without accounting for the anticipated utility corridor, would be 8-feet wider than the existing roadway width in this area.

Due to the removal of access to Union Street, a major north/south roadway corridor leading in and out of downtown Westfield, the traffic volume would be redistributed to alternate routes through downtown Westfield. The redistributed traffic would result in congestion at the Poplar Street roundabout to the point in which the intersection would no longer provide an acceptable LOS. Therefore, extending Jersey Street from Union Street to East Street would be required in order for this alternative to be feasible. Jersey Street would be extended to connect to the East Street roundabout with a typical section consisting of two 11-foot wide lanes, curb and gutter, and 6-foot wide sidewalks adjacent to the curb and gutter on both sides of the roadway. Due to the redistributed traffic, Penn Street would be improved from Union Street to East Street. The existing pavement would be reconstructed to two 12-foot wide travel lanes and 8-foot wide on-street parking on both sides of the roadway. This reconstruction of Penn Street would remain within the existing width of pavement.

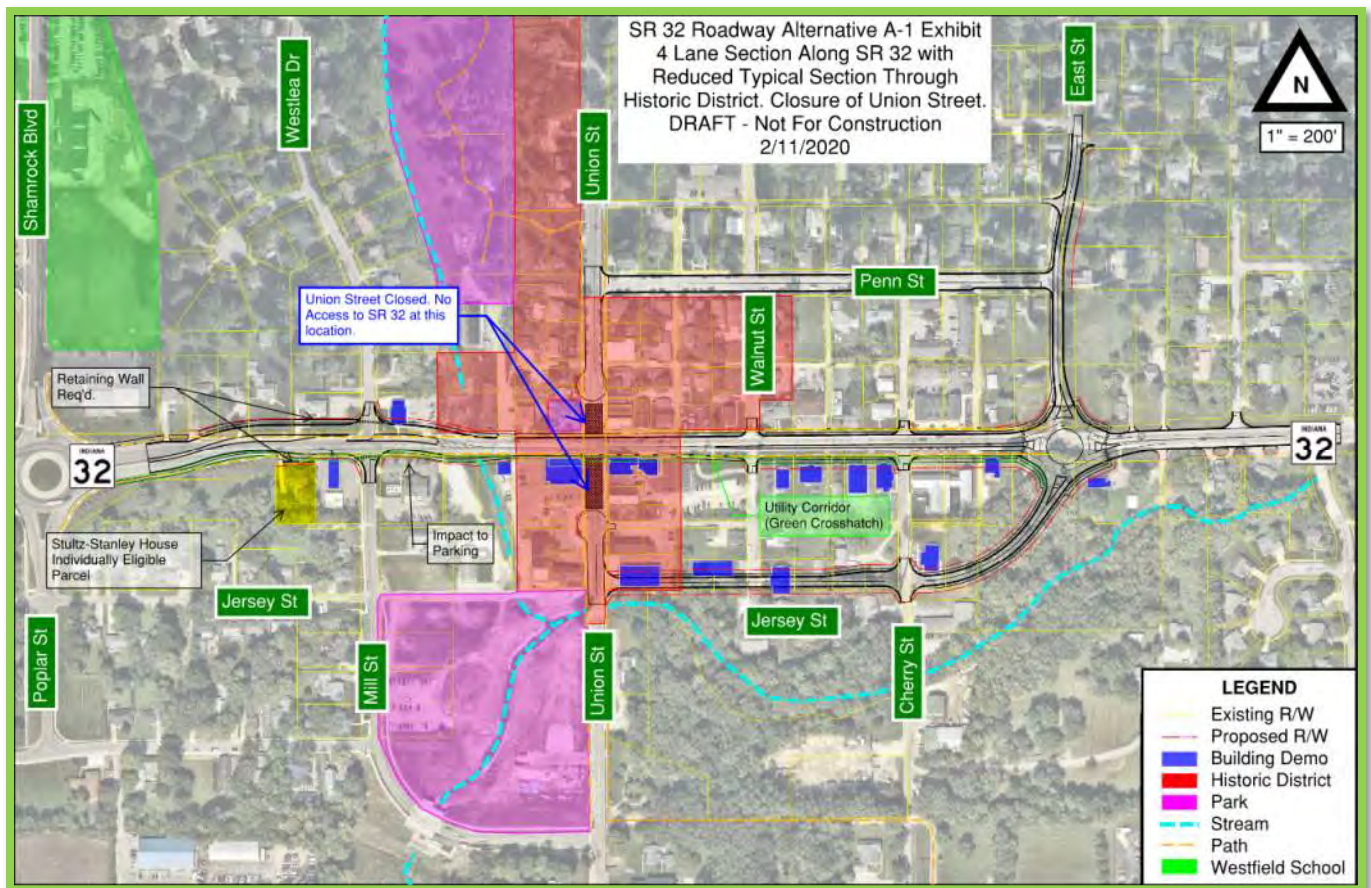


Figure 4: Alternative A-1



### 3.3. Alternative A-2: Widen SR 32 with Right-In/Right-Out At Union Street

In this alternative, outside of the Westfield Historic District the same typical section as Alternative A would be maintained. Inside the Westfield Historic District, access at SR 32 and Union Street would be restricted to a right-in/right-out (RIRO) only intersection (**Figure 5, Appendix B**). This allows for right turns on/off of SR 32 onto Union Street. With this configuration, all left turns at the intersection would be prohibited, and through movements along Union Street would also be prohibited. Within the boundaries of the Westfield Historic District, SR 32 would be reconstructed to consist of four 11-foot wide travel lanes with an 11-foot wide right turn lane for each direction, curb and gutter, and 8-foot wide sidewalks on both sides of the roadway separated by a 6-foot wide buffer against the curb and gutter. This would result in widening SR 32 south by 27-feet. This alternative was evaluated to attempt to reduce the typical section through the Westfield Historic District and minimize impacts.

The restricted access at SR 32 and Union Street would require local drivers to find alternate routes through downtown Westfield. The majority of redistributed traffic is expected to be pushed toward the existing Poplar Street roundabout or the proposed East Street roundabout at either end of the study corridor. Drivers would then utilize the minor roadway network to travel back to Union Street to continue to their destination. Based on the anticipated traffic volume redistribution, a heavy volume of eastbound and westbound right turns are expected to occur during the peak hours at SR 32 and Union Street. The right turn volume in both directions is high enough to warrant dedicated right turn lanes on SR 32.

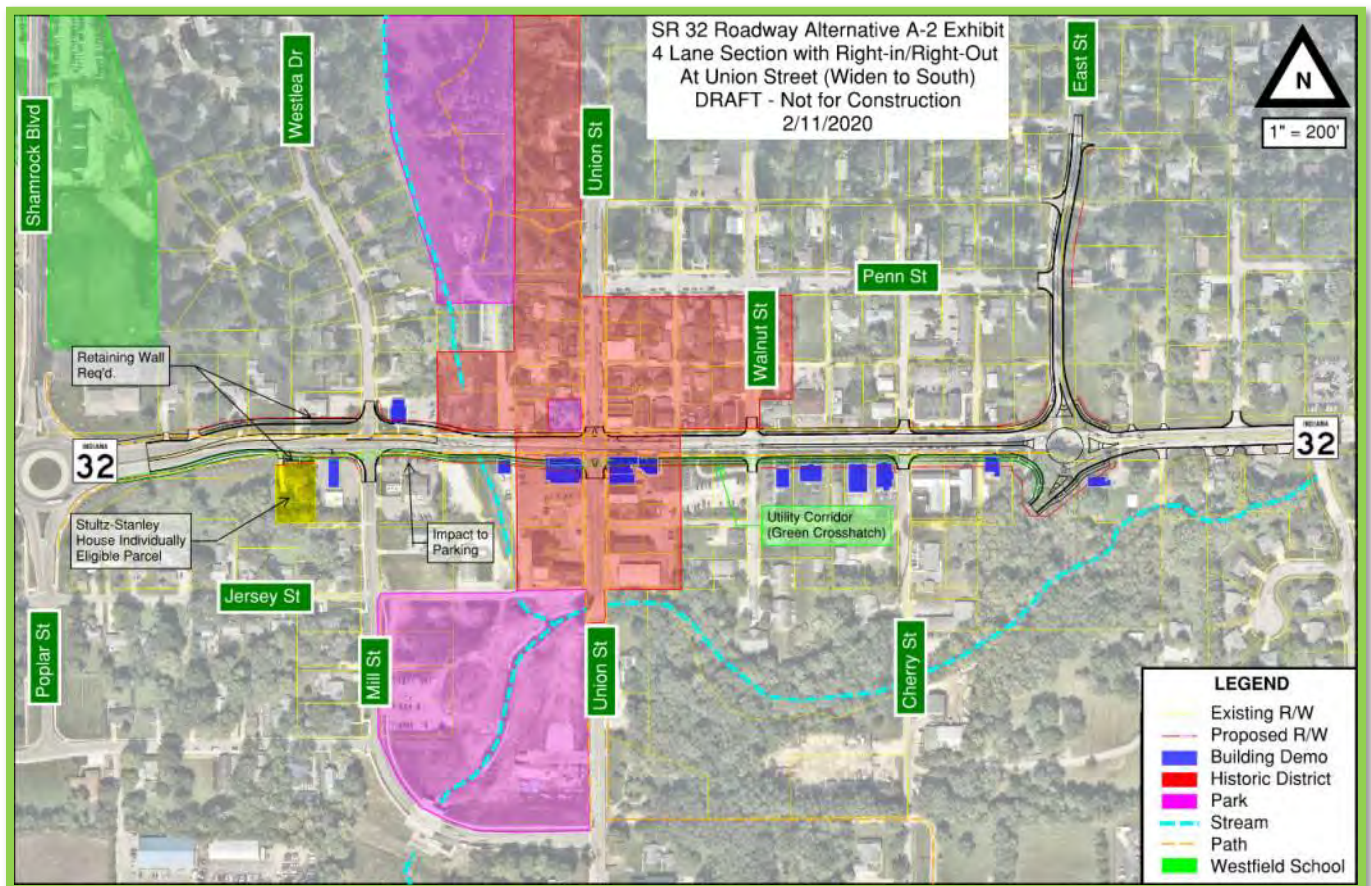


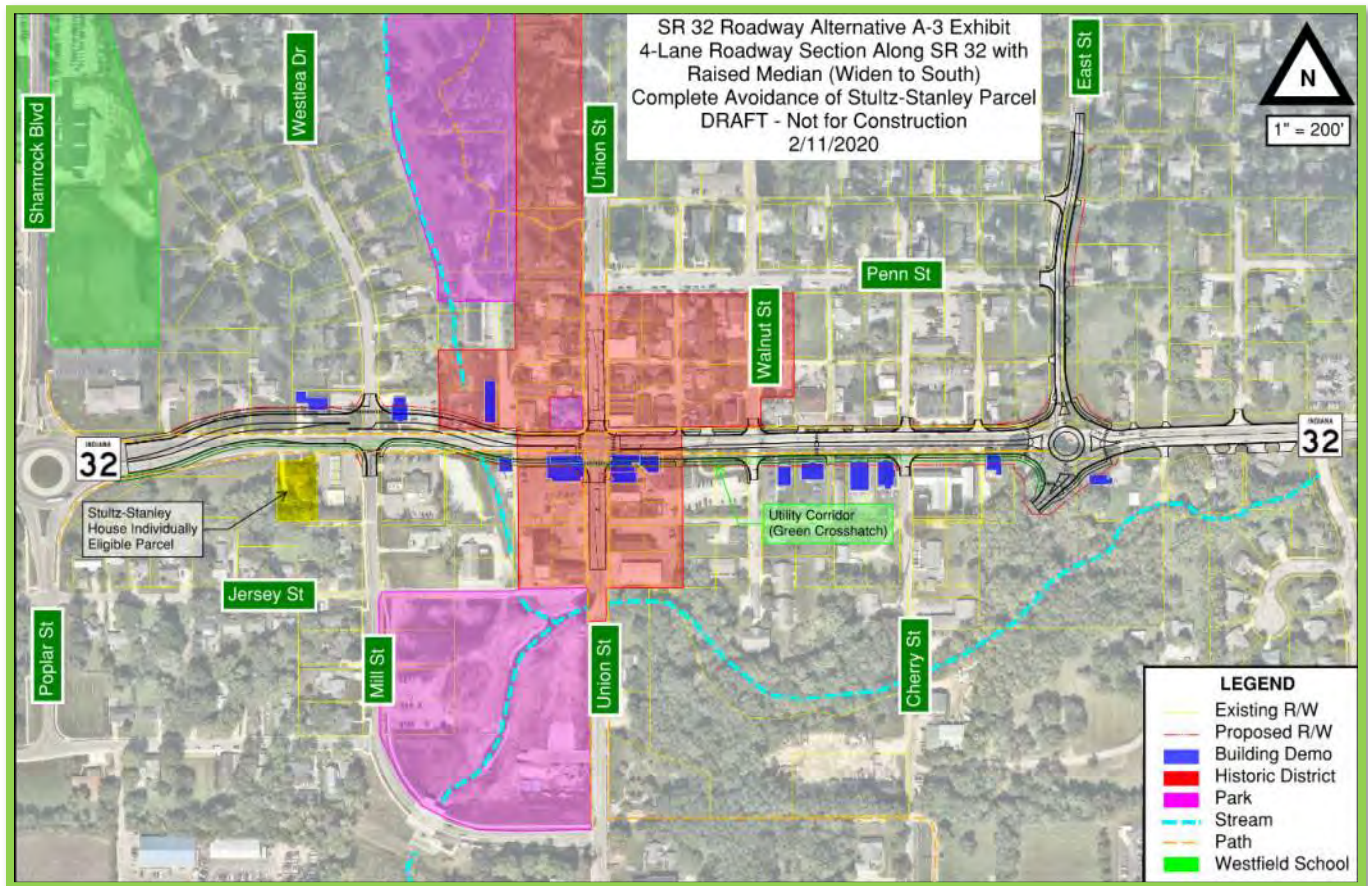
Figure 5: Alternative A-2

### 3.4. Alternative A-3: Widen SR 32 Avoidance of Stultz-Stanley House

This alternative involves widening and reconstructing SR 32 from just east of the Poplar Street roundabout to just east of Timberbrook Run, but shifts the alignment of SR 32 further north in front of the Stultz-Stanley House to avoid impacts



to the property (**Figure 6, Appendix B**). This alternative would maintain the same typical sections as Alternative A along SR 32 and East Street. In front of the Stultz-Stanley House, SR 32 would be shifted north by approximately 56-feet.



**Figure 6: Alternative A-3**

### 3.5. Alternative B: One-Way Pair SR 32 and Penn Street

In this alternative, SR 32 through downtown Westfield would be converted to a one-way pair utilizing SR 32 and Penn Street (**Figure 7, Appendix B**). SR 32 would be reconstructed to a one-way road carrying eastbound traffic while Penn Street would be reconstructed to a one-way road carrying westbound traffic. This reconstruction of Penn Street would include a new alignment of Penn Street beginning at Union Street and extending southwest to tie into the Poplar Street roundabout. Penn Street would be extended in the east partially along the existing East Street alignment to tie back into the existing SR 32. The current East Street intersection would be reconstructed to a roundabout where traffic flow splits onto the one-way pairs. East Street would then be reconstructed to tie into Penn Street (westbound SR 32), which would straighten the existing S-curve.

The typical section along eastbound SR 32 (existing SR 32 alignment) would consist of two 11-foot wide travel lanes, 7-foot wide on-street parking on both sides of the roadway, curb and gutter, and 8-foot wide sidewalks adjacent to the curb and gutter. At Westlea Drive/Mill Street, the roadway would widen and on-street parking along both sides of the road would transition to 11-foot wide left and right turn lanes that would transition back to on-street parking after the intersection. At Union Street the roadway would widen again and the on-street parking would transition to 11-foot wide left and right turn lanes. This would result in SR 32 being widened south by 8-feet.

The typical section along Penn Street (westbound SR 32) would consist of two 11-foot wide travel lanes, 7-feet of on-street parking on both sides of the roadway, curb and gutter, and 6-foot wide sidewalks adjacent to the curb and gutter.



West of Union Street, the typical section of SR 32 remains the same with the exception of no on-street parking. A traffic signal would be added at the intersection of Penn Street (westbound SR 32) and Union Street.

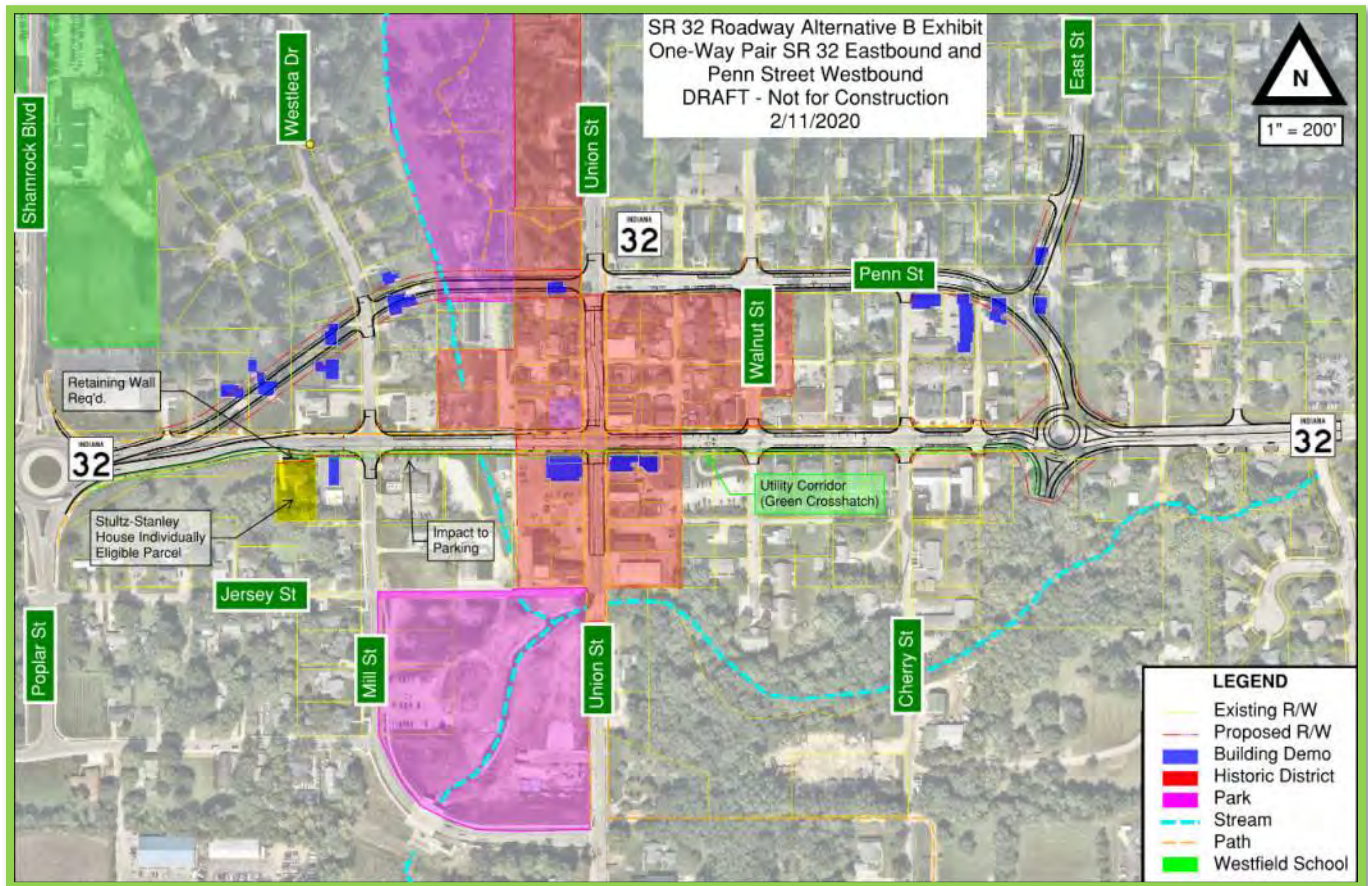


Figure 7: Alternative B

### 3.6. Alternative C: One-Way Pair SR 32 and Jersey Street

In this alternative, SR 32 through downtown Westfield would be converted to a one-way pair utilizing SR 32 and Jersey Street (**Figure 8, Appendix B**). SR 32 would be reconstructed to a one-way road carrying westbound traffic while Jersey Street would be reconstructed to a one-way road carrying eastbound traffic. This reconstruction of Jersey Street would include new alignment of Jersey Street between Poplar Street and Mill Street where Jersey Street would connect to the Poplar Street roundabout to tie back into the existing SR 32. Jersey Street would also include a new alignment between Union Street and East Street. The current East Street intersection would be reconstructed to a roundabout where the new Jersey Street alignment/eastbound SR 32 would tie back into the existing SR 32.

The typical section along westbound SR 32 (existing SR 32) would consist of two 11-foot wide travel lanes, 7-feet of on-street parking on both sides of the roadway, curb and gutter, and 8-foot wide sidewalks adjacent to the curb and gutter. At Westlea Drive/Mill Street, the roadway would widen and on-street parking along both sides of the road would transition to 11-foot wide left and right turn lanes that would transition back to on-street parking after the intersection. At Union Street the roadway would widen and the on-street parking would again transition to 11-foot wide left and right turn lanes. This would result in SR 32 being widened south by 8-feet.

The typical section along Jersey Street/eastbound SR 32 would consist of two 11-foot wide travel lanes, curb and gutter, and 6-foot wide sidewalks adjacent to the curb and gutter. At Union Street the roadway would widen to include 11-foot wide left and right turn lanes. At Cherry Street the roadway would widen to include an 11-foot wide left turn lane. A traffic signal would be added at the intersection of Jersey Street/eastbound SR 32 and Union Street.



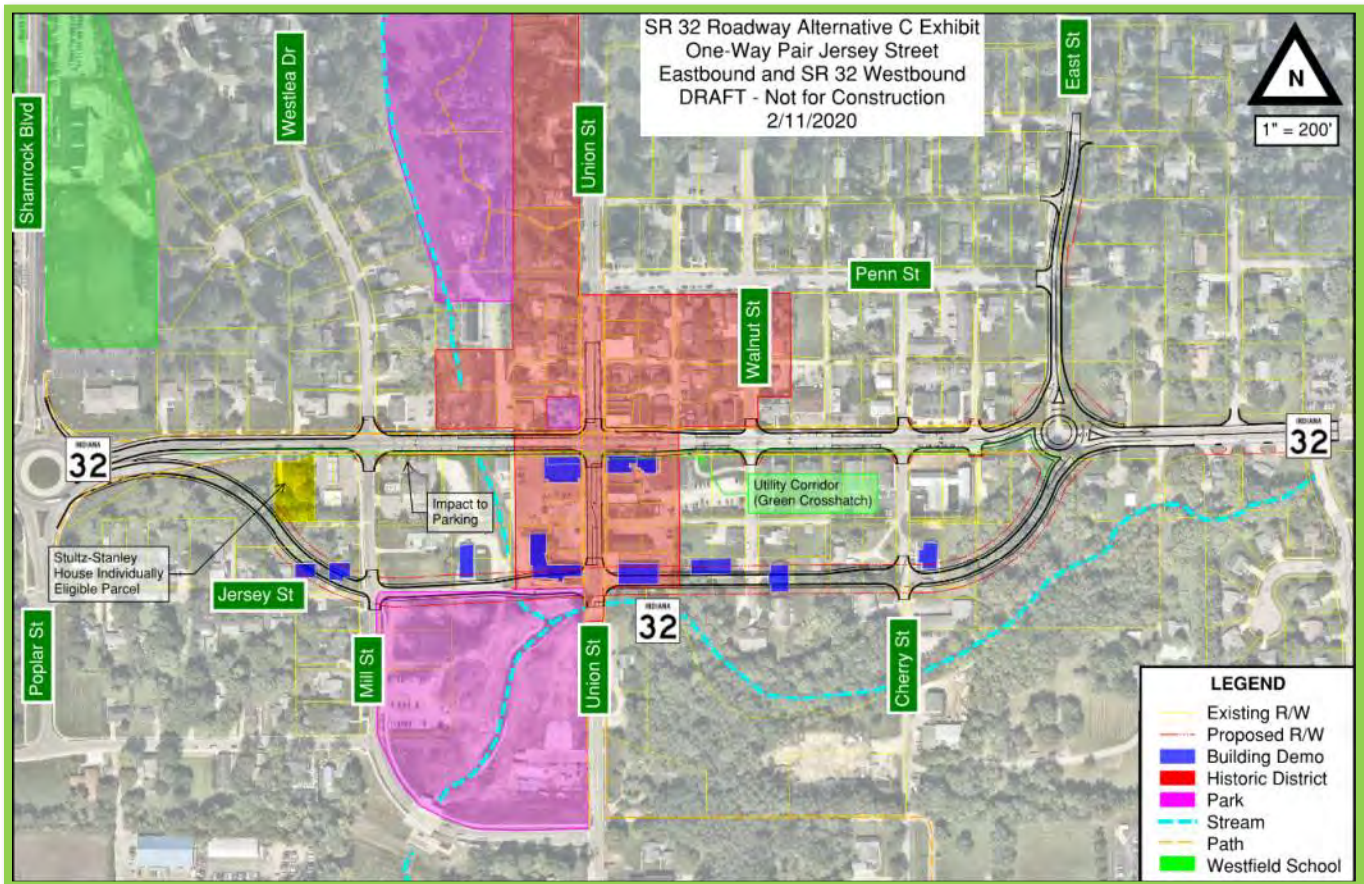


Figure 8: Alternative C

## 4. Analysis Evaluation Criteria

### 4.1 Historic Properties

As noted in **Section 1.1**, the Section 106 process was initiated for this project when it was anticipated the project would receive federal funding. Since the initiation of the Section 106 process, federal funding has been removed from the project, and funding of the project is now anticipated to be met through a combination of local and state funds. Due to receiving funding from the State of Indiana, the project is required to follow the IHPAA outlined in IC 14-21-1. The IHPAA requires a Certificate of Approval (COA) for any alteration, demolition, or removal of historic sites or structures listed on the Indiana Register of Historic Sites and Structures (IRHSS), and/or any properties listed on the NRHP.

#### 4.1.1 Westfield Historic District (NR-2521)

The Westfield Historic District consists of an even mix of historic commercial and residential buildings that extend out from the intersection of Main Street (SR 32) and Union Street in downtown Westfield. The Westfield Historic District includes thirty-seven Contributing resources (thirty-six buildings and one structure) and fourteen Non-Contributing resources (thirteen buildings and on site). The period of significance ranges from circa 1850, the date of construction for the oldest building in the Westfield Historic District, to 1968. The District was listed in the NRHP in 2018 with significance in the areas of Commerce and Architecture (Criteria A and C).

#### 4.1.2 Stultz-Stanley House

Based on recommendation of the Indiana SHPO, the Stultz-Stanley House at 209 West Main Street is also considered eligible for listing in the NRHP under Criterion C for its Craftsman architecture. The Indiana SHPO stated that *“The house has all the key traits of the bungalow type - it is a one-and-a-half story house with overhanging roof, exposed rafters, and a broad porch/sunroom across the Main Street elevation... The interior also reveals a twist on the Craftsman style: The homeowners elected to build their bungalow around an existing house. Family lore, and physical evidence, show that the house was originally a late Greek Revival/Italianate house that was oriented so that the current west elevation faced Main Street... Reuse of an existing house was not incompatible with the modern simplicity of the Craftsman movement...The general idea of saving and updating a house was part and parcel of the Craftsman era, including Central Indiana, and the Stultz-Stanley House is a solid example.”*

Although the IHPPA does not require a COA for non-state owned properties that are determined to be eligible for listing on the NRHP, the effects to the Stultz-Stanley House will continue to be taken into consideration in this analysis.

## 4.2 Relocations

Potential relocations were identified based on preliminary designs of each alternative and the potential right-of-way and construction limits that would be required. This area took into account the need for grading and any required buffer zones. Relocations were identified if a structure would be impacted by potential construction activities. To account for multi-unit residential and commercial buildings within the project area, the number of units were also included.

## 4.3 Right-of-way

Potential right-of-way acquisition was based on preliminary designs of each alternative. The potential right-of-way acquisition took into account all aspects of the preliminary designs including sidewalks and buffers. The cost of the potential right-of-way acquisition was determined based on estimates provided by INDOT Right-of-Way Division and implemented in the total costs of the alternative.

## 4.4 Parks

Three parks are located within the project area: Asa Bales Park, Hadley Park, and Grand Junction Park and Plaza. These parks are defined below.

#### 4.4.1 Asa Bales Park

Asa Bales Park is a 13.24-acre park partially within the project area that begins at the end of Camilla Court and extends north to Hoover Street. The park is located between Westfield Community School buildings and residential areas. The park is operated by the City of Westfield. There are two vehicle access points to the park with one being in the north from Hoover Street and one in the south from Camilla Court. Both entrances have parking lots for visitors. A paved trail runs from the northern parking lot down to the southern parking lot. The park also includes multiple shelters, a natural amphitheater, playground, and skate park.

#### 4.4.2 Hadley Park

Hadley Park is a 0.15-acre park that is located at the northwest corner of SR 32 and Union Street within the project area. This park is accessible from the sidewalks along SR 32 and Union Street. The park consists of brick paved paths, flower gardens with trees, fencing along all sides, and benches for visitors.

#### 4.4.3 Grand Junction Park and Plaza

The Grand Junction Park and Plaza is a 6-acre park located one block south of SR 32 that is currently under construction. Construction began on the park in 2019 with expected full completion in 2021. The park is bounded by Jersey Street, Mill Street, and Union Street. The park is planned to include an outdoor performance venue, café, children’s play area, and a trailhead pavilion. In the northwest corner of the park is the Plaza, which will become a central gathering place for festivals, markets, and other events hosted by the city throughout the year. The portion



of Jersey Street adjacent to the park, between Mill Street and Union Street, is incorporated into the park boundaries and plan with intentions to temporarily close that portion of the street throughout the year to act as a plaza for events. The park plan also includes landscaping on both sides of the street. Improvements to Jersey Street between Mill Street and Union Street were incorporated into construction plans and are currently underway. Grand Junction Park and Plaza is further discussed in **Section 1.3.1** above.

## 4.5 Trails

Four trails are located within the project area: Asa Bales Park Trail, Grand Junction Trail, SR 32 Trail, and Union Street Trails. The location of the trails are defined below.

### 4.5.1 Asa Bales Park Trail

This trail is a paved trail through the middle of Asa Bales Park. The trail can be accessed at the end of Camilla Court where a parking lot exists for park and trail use. A fork of this trail splits just north of the parking lot to connect east to Union Street just north of Penn Street. This trail is part of larger bike paths throughout Westfield and Hamilton County.

### 4.5.2 Grand Junction Trail

This trail borders the east side of Grand Junction Park and Plaza along Union Street from South Street north to SR 32 and utilizes the existing sidewalk. This trail is part of the overall Grand Junction Park and Plaza development that includes a trailhead pavilion.

### 4.5.3 SR 32 Trail

This trail runs along SR 32 utilizing the existing sidewalk along the north and south side of the roadway. The north trail and south trail run parallel to each other through the project area. This trail provides connection to other trails throughout Westfield including the Asa Bales Park Trail and the Grand Junction Trail.

### 4.5.4 Union Street Trails

These trails run along Union Street utilizing the existing sidewalk along the west and east side of the roadway. The west trail begins in the northwest corner of SR 32 and Union Street extending north along Union Street out of the project area. The east trail extends along the east side of Union Street north and south of SR 32. This trail provides connection to other trails throughout Westfield including Asa Bales Park Trail and Grand Junction Trail.

Due to the trails location in the center of the project area, all of the trails will be temporarily impacted by the proposed alternatives. Therefore, this evaluation criterion is not a determining factor in the preferred alternative.

## 4.6 Level of Service (LOS)

The LOS for each alternative was sourced from the *Traffic Operations Analysis* discussed in **Section 1.2.1**. The definitions for LOS can also be found in **Section 1.2.1**.

## 4.7 Stream crossings

Two streams, Grassy Branch Creek and the J.M. Thompson Drain, flow through the project area. Grassy Branch Creek flows east to west through the project area and runs parallel to SR 32 until it flows under Union Street, south of SR 32, where it enters Grand Junction Park and Plaza. J. M. Thompson Drain flows through the project area from north to south and under SR 32 west of Union Street before its confluence with Grassy Branch Creek in Grand Junction Park and Plaza.

## 4.8 Average Travel Time Benefits

Average travel time benefit was determined by evaluating the time it takes motorists to travel along SR 32 from where they enter the project area to their destination, which is then compared to the time it would take them to travel the same route in the No Build Alternative. The average travel time benefit also took into consideration the traffic

congestion in the corridor and those alternatives that require traffic to be routed along a different street. The average travel time benefit then can be compared across alternatives to determine the impact to the motorists traveling along the project area.

#### 4.9 Roadway miles shifted from Westfield to INDOT

Due to two of the alternatives involving rerouting SR 32 onto local streets maintained by the City of Westfield, the amount of roadway miles that would then need to be relinquished from the City of Westfield to INDOT was accounted for in the evaluation criteria.

#### 4.10 Construction costs

Total cost of each alternative was determined by combining the estimated cost of potential right-of-way acquisition and the estimated construction costs. Construction costs were estimated based on construction taking place during 2022 with an estimated 4.5% inflation and includes reimbursable utility relocation cost, as well as a 30% contingency. The cost of the potential right-of-way acquisition was determined based on estimates provided by INDOT Right-of-Way Division and implemented in the total costs of the alternatives.

### 5. Analysis of Alternatives

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The evaluation criteria listed in **Section 4** was assessed for each of the alternatives and can be seen in **Table 5** below, as well as in **Appendix A**. The evaluation criteria for Alternative A is summarized below. Alternatives A-1 through C are summarized and compared to Alternative A, the proposed action.

#### 5.1 Alternative A: Widen SR 32

This alternative addresses the project's purpose and need. The existing extensive queuing and congestion are both addressed through the addition of the travel lanes and the roundabout at East Street. This alternative improves corridor mobility along SR 32 by reducing the potential for traffic flow to backup into the Poplar Street Boulevard roundabout and from impeding numerous drives and intersecting roads along the roadway. Based on the *Traffic Operations Analysis* prepared (**Appendix C**), this alternative would function at an acceptable level of service (LOS D or better) in the design year. Alternative A fully satisfies the projects purpose and need.

This alternative would result in an impact to the Westfield Historic District. As a result of the proposed widening for the added travel lanes and turn lanes required to accommodate existing and projected traffic, the project would remove six buildings within the Westfield Historic District (101 S Union Street, 102 S Union Street, 103 S Union Street, 104 S Union Street, 108 S Union Street, and 111 E Main Street). All six buildings are identified as contributing resources to the Westfield Historic District. Overall, the project would acquire a total of 0.28-acre of right-of-way from the Westfield Historic District. Widening SR 32 to the north through the Westfield Historic District (or a combination of north and south) was evaluated and it was determined that it would result in a larger impact by requiring the removal of at least five additional contributing buildings to the Westfield Historic District, as well as impacts to Hadley Park. Alternative A relocates the same number of buildings in the Westfield Historic District at Alternatives A-1, A-2, and B, while Alternatives A-3 and C have one additional building relocation.

Additionally, this alternative would result in an impact to the Stultz-Stanley House. The project would acquire 0.016 acre of right-of-way from the house, as well as construct a retaining wall in front of the house to stabilize the yard and avoid compromising the structure. The impact to the Stultz-Stanley house under Alternative A is the same impact as Alternatives A-1, A-2, C, and B.

Alternative A, along with Alternative A-3, has an average travel time benefit at 3.3-minutes faster than the No Build Alternative, which is the highest average travel time benefit amount. Only two other alternatives, Alternatives B and C, have a positive average travel time benefit. Alternative A has the second lowest proposed right-of-way acquisition



amount at 2.25-acres, which is slightly more (0.13-acre more) than the alternative with the lowest proposed right-of-way acquisition, Alternative A-2. In addition to the removal of six buildings in the Westfield Historic District, Alternative A would result in one residential building (1-unit) and eight commercial buildings (9-units) being relocated. Alternative A-2 has the same amount of relocations, while Alternative A-3 has an additional building removed from the Westfield Historic District. This is the lowest amount of residential buildings relocated by the proposed alternatives. Alternative A has the second lowest total cost at an estimated \$15,527,400, which is 3% higher than the lowest total cost alternative, Alternative A-2.

## 5.2 Alternative A-1: Reduced Typical Section through Historic District and Closure of Union Street

This alternative addresses the project's purpose and need. The existing extensive queuing and congestion are both addressed along SR 32 by preventing traffic flow from backing up into the Poplar Street Boulevard roundabout and from impeding numerous drives and intersecting roads along the roadway. Based on the *Traffic Operations Analysis* prepared (**Appendix C**), this alternative would function at an acceptable level of service (LOS D or better) in the design year. However, the average travel time per driver would be 2-minutes slower than the existing conditions (No Build Alternative) due to the rerouting of traffic from the lack of Union Street access. When comparing the average travel time per driver to Alternative A, this alternative would be 4.4-minutes slower per driver. This time delay would impact emergency vehicles moving through downtown Westfield. Alternative A-1 does not reduce impacts to the Westfield Historic District or the Stultz-Stanley House compared to Alternative A. This alternative would cause relocations of an additional two residential buildings (6-units) and one additional commercial building (1-unit) compared to Alternative A. Approximately 3.27-acres of permanent right-of-way would be acquired due to the required extension of Jersey Street, which is the highest amount of right-of-way acquisition compared to all the alternatives. Project costs associated with Alternative A-1 are an estimated \$7 million dollars more than Alternative A and is the most expensive of all alternatives due to the increased impacts to residences, a commercial business, and additional right-of-way.

## 5.3 Alternative A-2: Widen SR 32 with Right-In/Right-Out At Union Street

This alternative addresses the project's purpose and need. The existing extensive queuing and congestion are both addressed through the addition of the travel lanes and the roundabout at East Street. This improves the corridor mobility along SR 32 by preventing traffic flow from backing up into the Poplar Street Boulevard roundabout and from impeding numerous drives and intersecting roads along the roadway. Based on the *Traffic Operations Analysis* prepared (**Appendix C**), this alternative would function at an acceptable level of service (LOS D or better) in the design year. However, this alternative would have an overall LOS D and is the lowest LOS of all the alternatives. This alternative would have an average travel time per driver that would be 1-minute slower than the existing conditions (No Build Alternative) due to the rerouting of traffic from the reduced Union Street access. When comparing the average travel time per driver to Alternative A, this alternative would be almost 4.5-minutes slower per driver. This time delay would impact emergency vehicles moving through downtown Westfield. Alternative A-2 does not reduce the amount of relocations within the Westfield Historic District nor does it reduce impacts to the Stultz-Stanley House when compared to Alternatives A, A-1, and B. This alternative would have the same impacts to commercial and residential buildings/units as Alternative A and would acquire approximately 0.13-acre less right-of-way than Alternative A. Project costs associated with Alternative A-2 are estimated to be approximately \$477,000 dollars less than Alternative A, but this would result in only a 3% reduction in the project costs.

## 5.4 Alternative A-3: Widen SR 32 Avoidance of Stultz-Stanley House

This alternative addresses the project's purpose and need. The existing extensive queuing and congestion are both addressed through the addition of the travel lanes and the roundabout at East Street. This improves the corridor mobility along SR 32 by preventing traffic flow from backing up into the Poplar Street Boulevard roundabout and from impeding numerous drives and intersecting roads along the roadway. Based on the *Traffic Operations Analysis* prepared

(**Appendix C**), this alternative would function at an acceptable level of service (LOS D or better) in the design year. Alternative A-3 avoids impacts to the Stultz-Stanley House; however, this alternative increases the impact to the Westfield Historic District by removing an additional building that is a contributing resource compared to Alternatives A, A-1, and A-2. Overall, this alternative would acquire a total of 0.35-acre of right-of-way from the Westfield Historic District, which is the greatest amount of right-of-way of all the alternatives.

## 5.5 Alternative B: One-Way Pair SR 32 and Penn Street

This alternative addresses the project's purpose and need. The existing extensive queuing and congestion are both addressed through the conversion to a one-way pair and the roundabout at East Street. This improves the corridor mobility for vehicles through downtown Westfield by preventing traffic flow from backing up into the Poplar Street Boulevard roundabout and from impeding numerous drives and intersecting roads along the roadway, but does not specifically improve the mobility along the existing SR 32 corridor through downtown Westfield. The rerouting of a state road through the residential area located north of downtown disrupts the community cohesion of the residential area by separating existing residences south of the proposed westbound SR 32 alignment from the rest of the residential area to the north. This would also introduce a high traffic road directly adjacent to those residences along both sides of the proposed alignment. Additionally, pedestrians crossing Penn Street would be crossing a high traffic state road compared to currently crossing a less traveled residential street, which would decrease how efficiently the pedestrians can move through the area. Based on the *Traffic Operations Analysis* prepared (**Appendix C**), this alternative would function at an acceptable level of service (LOS D or better) in the design year. However, Alternative B does not reduce the amount of impacts to the Westfield Historic District or the Stultz-Stanley House compared to Alternatives A, A-1, and A-2. This alternative would impact Asa Bales Park and would acquire 0.24-acres of right-of-way from the park. This would impact the southern entrance to the park and remove approximately half of the available parking for the park. Alternative B and Alternative C are the only alternatives that would result in impacts to local parks. A total of ten residential buildings (17-units) would be impacted by this alternative. This alternative would require the most relocations of residential units than any other alternative; an additional 16-units compared to Alternative A. Overall, there would be seventeen buildings (24-units) when accounting for the one commercial relocation and the six buildings removed from the Westfield Historic District in this alternative. Project costs associated with Alternative B are an estimated \$2.5 million dollars more than Alternative A, which is an almost 16% increase in project costs.

## 5.6 Alternative C: One-Way Pair SR 32 and Jersey Street

This alternative addresses the project's purpose and need. The existing extensive queuing and congestion are both addressed through the conversion to a one-way pair and the roundabout at East Street. This improves the corridor mobility for vehicles through downtown Westfield by preventing traffic flow from backing up into the Poplar Street Boulevard roundabout and from impeding numerous drives and intersecting roads along the roadway, but does not specifically improve the mobility along the existing SR 32 corridor through downtown Westfield. The rerouting of a state road through the residential area located south of downtown disrupts the community cohesion of the residential area by separating existing residences north of the proposed eastbound SR 32 alignment from the rest of the residential area to the south. This would also introduce a high traffic road directly adjacent to those residences along both sides of the proposed alignment. Additionally, pedestrians crossing Jersey Street would be crossing a high traffic state road compared to currently crossing a less traveled residential street, which would decrease how efficiently the pedestrians can move through the area. It is anticipated that the amount of pedestrians in the area of Jersey Street will increase significantly with the completion of Grand Junction Park and Plaza. Based on the *Traffic Operations Analysis* prepared (**Appendix C**), this alternative would function at an acceptable level of service (LOS D or better) in the design year. However, Alternative C increases the amount of impacts to the Westfield Historic District compared to Alternatives A, A-1, A-2, and B. It does remove the impact of a retaining wall at the Stultz-Stanley House, but still acquires 0.022-acre of right-of-way from the southwest corner of the property. This alternative would have impacts to Grand Junction Park and Plaza that would result in acquiring 0.34-acre of right-of-way and affecting the use of Jersey Street as part of the park. In addition to six buildings removed from the Westfield Historic District, four residential buildings (8-units) and



two commercial buildings (2-units) would be relocated. This is the second highest total of residential relocations out of all the alternatives and has an additional 6-units that are relocated compared to Alternatives A, A-2, and A-3. Project costs associated with Alternative C is an estimated \$6.2 million dollars more than Alternative A, which is a 40% increase in project costs. This is the second most expensive alternative just behind Alternative A-1.

Table 5: Evaluation Matrix

SR 32 Westfield Reconstruction (Des. No. 1801731) - Evaluation Matrix								
Evaluation Criteria		No Build	Alternatives					
			A	A-1	A-2	A-3	B <sup>2</sup>	C
			3 Lane Section along SR 32 with Raised Median (Widened to South)	4 Lane Section Along SR 32 with Reduced Typical Section Through Historic District. Closure of Union Street	4 Lane Section Along SR 32 with Right-In/Right-Out At Union Street (Widened to South)	4 Lane Section along SR 32 with Raised Median (Widened to South) Complete Avoidance of Stultz-Stanley	One Way Pair SR 32 Eastbound & Penn St. Westbound	One Way Pair Jersey St. Eastbound & SR 32 Westbound
Does the Project Meet Purpose and Need? (Y/N)		N	Y	Y	Y	Y	Y	Y
Anticipated Relocations	Westfield Historic District (Removal)	0	6 Buildings (6 Units)	6 Buildings (6 Units)	6 Buildings (6 Units)	7 Buildings (7 Units)	6 Buildings (6 Units)	7 Buildings (7 Units)
	Residential	0	1 Building (1 Unit)	3 Buildings (7 Units)	1 Building (1 Unit)	1 Building (1 Unit)	10 Buildings (17 Units)	4 Buildings (8 Units)
	Commercial	0	8 Buildings (9 Units)	9 Buildings (10 Units)	8 Buildings (9 Units)	8 Buildings (9 Units)	1 Building (1 Unit)	2 Buildings (2 Units)
	Total	0	15 Buildings (16 Units)	18 Buildings (23 Units)	15 Buildings (16 Units)	16 Buildings (17 Units)	17 Buildings (24 Units)	13 Buildings (17 Units)
Anticipated Permanent Right-of-Way	Westfield Historic District	0.00	0.28	0.20	0.23	0.35	0.16	0.34
	Stultz-Stanley House	0.00	0.016	0.016	0.016	0	0.016	0.022
	Residential Acreage	0.00	0.92	1.52	0.96	1.01	1.93	2.17
	Commercial Acreage	0.00	1.04	1.54	0.91	1.13	0.19	0.72
Total Acreage		0.00	2.25	3.27	2.12	2.49	2.30	3.26
Park Impacts (Acreage)		0	0	0	0	0	0.24 (1 Park)	0.34 (1 Park)
Trail Impacts		0	4	4	4	4	4	4
Traffic Level of Service (Design Year 2042)		LOS F	LOS C	LOS C	LOS D	LOS C	LOS C	LOS C
Stream Crossings		N/A	1	1	1	1	2	2
Average Travel Time Benefits (Minutes Per Driver)		0	3.3 Minutes Faster	2.0 Minutes Slower	1.1 Minutes Slower	3.3 Minutes Faster	3.2 Minutes Faster	3.0 Minutes Faster
Roadway Miles Shifted from Westfield to INDOT		0.00	0.00	0.00	0.00	0.00	0.21	0.11
Roadway Project Length (Total Miles)		0.00	0.72	0.91	0.72	0.72	1.15	1.20
Total Cost (Construction + Right-of-Way) (2022) <sup>1</sup>		\$0	\$15,527,400	\$22,524,200	\$15,050,300	\$16,246,600	\$17,980,100	\$21,618,700

Notes:

<sup>1</sup> Construction costs are estimated to Construction Year 2022 with an estimated 4.5% inflation and include reimbursable utility relocation cost and a 30% contingency. Estimated Right of Way Cost is based on estimates provided by INDOT Right-of-Way Division.

<sup>2</sup> Alternative B requires relocation of Multi-Family Housing facility (13 Units)

## 6. Selection of Preferred Alternative

The analysis of the evaluation criteria in **Section 5** did not result in an alternative with the fewest impacts across all criteria. Analysis of the evaluation criteria between alternatives in **Section 5** reveals that the proposed action, (Alternative A) has the second lowest total cost, which accounts for the potential right-of-way cost and the cost of construction. Alternative A only relocates a single residential unit and does not disrupt the community cohesion of the existing residential areas. Alternative A does not introduce a high traffic roadway adjacent to residential houses nor does it decrease the efficiency of pedestrians moving through the residential area. Alternative A has a high average travel time benefit due to the reduction in traffic congestion, as well as allows motorists to take a more direct route along SR 32. Alternative A avoids impacting the existing local parks and the future plans for the community's use of those parks. Alternative A minimizes the impact to the Stultz-Stanley house through the use of a retaining wall and has no more impacts to the Westfield Historic District than any other alternative. Alternative A best addressed the purpose and need of the project while balancing the impacts in the project area. Therefore, Alternative A has been determined to be the preferred alternative.

# Appendix A



SR 32 Westfield Reconstruction (Des. No. 1801731) - Evaluation Matrix								
Evaluation Criteria		Alternatives						
		No Build	A	A-1	A-2	A-3	B <sup>2</sup>	C
			4 Lane Section along SR 32 with Raised Median (Widen to South)	4 Lane Section Along SR 32 with Reduced Typical Section Through Historic District. Closure of Union Street	4 Lane Section Along SR 32 with Right-In/Right-Out At Union Street (Widen to South)	4 Lane Section along SR 32 with Raised Median (Widen to South) Complete Avoidance of Stultz-Stanley	One-Way Pair: SR 32 Eastbound & Penn St. Westbound	One-Way Pair: Jersey St. Eastbound & SR 32 Westbound
Does the Project Meet Purpose and Need? (Y/N)		N	Y	Y	Y	Y	Y	Y
Anticipated Relocations	Westfield Historic District (Removal)	0	6 Buildings (6 Units)	6 Buildings (6 Units)	6 Buildings (6 Units)	7 Buildings (7 Units)	6 Buildings (6 Units)	7 Buildings (7 Units)
	Residential	0	1 Building (1 Unit)	3 Buildings (7 Units)	1 Building (1 Unit)	1 Building (1 Unit)	10 Buildings ( 17 Units)	4 Buildings (8 Units)
	Commercial	0	8 Buildings (9 Units)	9 Buildings (10 Units)	8 Buildings (9 Units)	8 Buildings (9 Units)	1 Building (1 Unit)	2 Buildings (2 Units)
	Total	0	15 Buildings (16 Units)	18 Buildings (23 Units)	15 Buildings (16 Units)	16 Buildings (17 Units)	17 Buildings (24 Units)	13 Buildings (17 Units)
Anticipated Permanent Right-of-Way	Westfield Historic District	0.00	0.28	0.20	0.23	0.35	0.16	0.34
	Stultz-Stanley House	0.00	0.016	0.016	0.016	0	0.016	0.022
	Residential Acreage	0.00	0.92	1.52	0.96	1.01	1.93	2.17
	Commercial Acreage	0.00	1.04	1.54	0.91	1.13	0.19	0.72
	Total Acreage	0.00	2.25	3.27	2.12	2.49	2.30	3.26
Park Impacts (Acreage)		0	0	0	0	0	0.24 (1 Park)	0.34 (1 Park)
Trail Impacts		0	4	4	4	4	4	4
Traffic Level of Service (Design Year 2042)		LOS F	LOS C	LOS C	LOS D	LOS C	LOS C	LOS C
Stream Crossings		N/A	1	1	1	1	2	2
Average Travel Time Benefits (Minutes Per Driver)		0	3.3 Minutes Faster	2.0 Minutes Slower	1.1 Minutes Slower	3.3 Minutes Faster	3.2 Minutes Faster	3.0 Minutes Faster
Roadway Miles Shifted from Westfield to INDOT		0.00	0.00	0.00	0.00	0.00	0.21	0.11
Roadway Project Length (Total Miles)		0.00	0.72	0.91	0.72	0.72	1.15	1.20
Total Cost (Construction + Right-of-Way) (2022) <sup>1</sup>		\$0	\$15,527,400	\$22,524,200	\$15,050,300	\$16,246,600	\$17,980,100	\$21,618,700

Notes:

<sup>1</sup> Construction costs are estimated to Construction Year 2022 with an estimated 4.5% inflation and include reimbursable utility relocation cost and a 30% contingency. Estimated Right of Way Cost is based on estimates provided by INDOT Right-of-Way Division.

<sup>2</sup> Alternative B requires relocation of Multi-Family Housing facility (13 Units)

# Appendix B





Figure 1: Project Area

City of Westfield  
2728 E 171st Street  
Westfield, IN 46074

SR 32 Reconstruction  
Des. No. 1801731  
Location: Westfield  
Township: Washington  
County: Hamilton  
State: Indiana  
Date: 04/26/2019



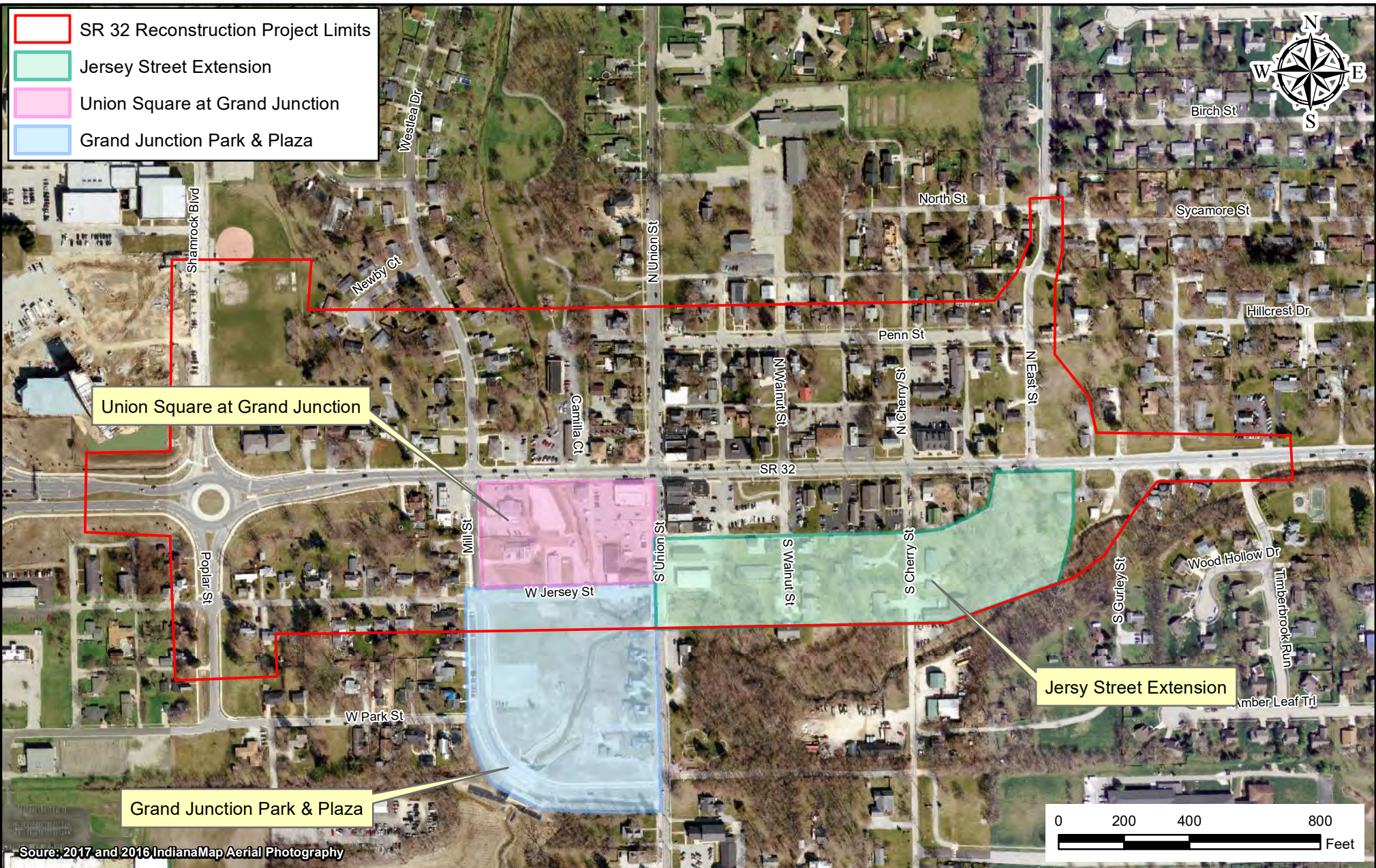


Figure 2: Westfield Developments

SR 32 Reconstruction  
Des. No. 1801731  
Location: Westfield  
Township: Washington  
County: Hamilton  
State: Indiana

Date: 07/23/2019

City of Westfield  
2728 E 171st Street  
Westfield, IN 46074

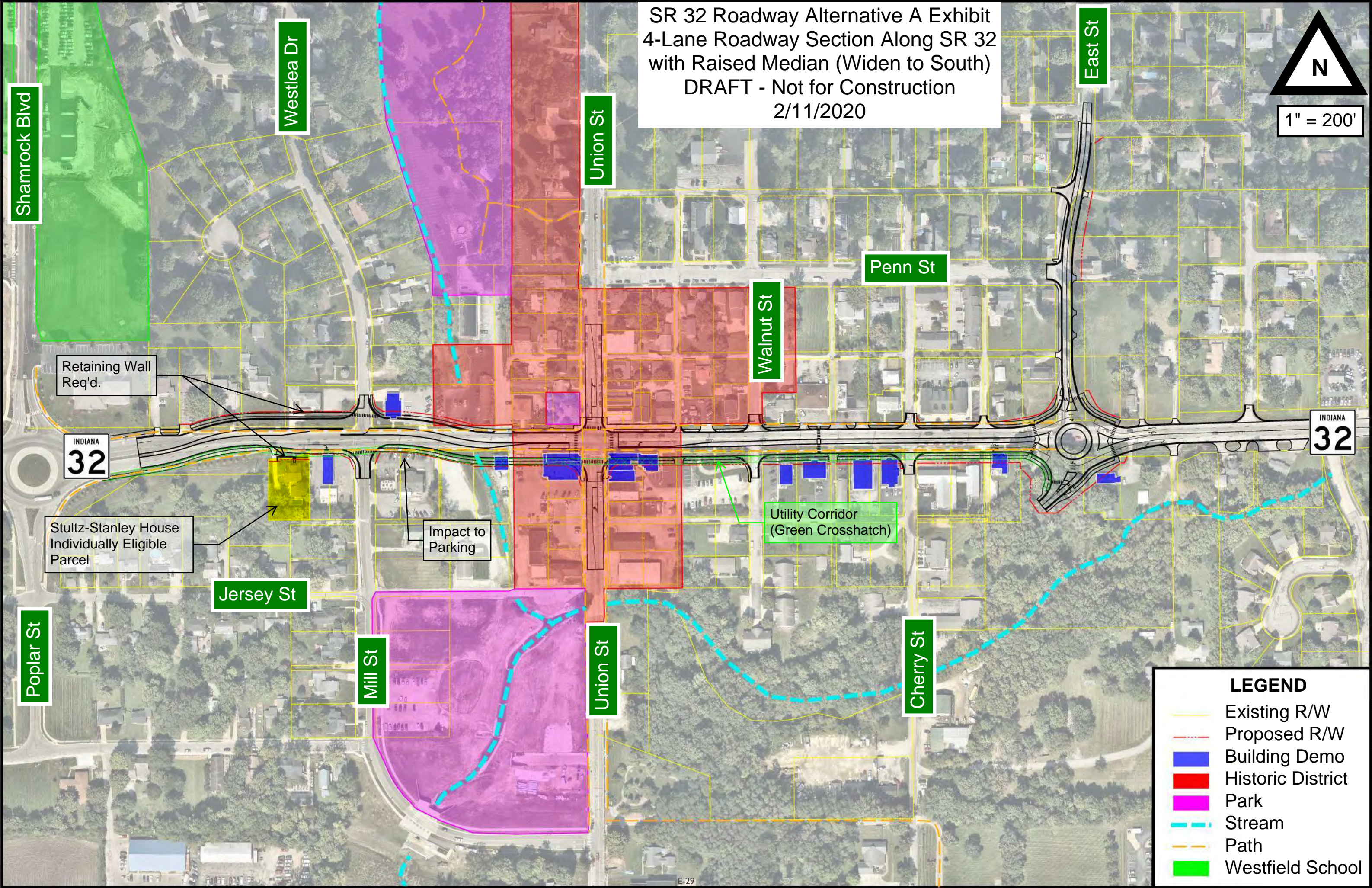




SR 32 Roadway Alternative A Exhibit  
4-Lane Roadway Section Along SR 32  
with Raised Median (Widen to South)  
DRAFT - Not for Construction  
2/11/2020

N

1" = 200'



LEGEND

- Existing R/W
- Proposed R/W
- Building Demo
- Historic District
- Park
- Stream
- Path
- Westfield School



SR 32 Roadway Alternative A-1 Exhibit  
4 Lane Section Along SR 32 with  
Reduced Typical Section Through  
Historic District. Closure of Union Street  
DRAFT - Not For Construction  
2/11/2020

 $1'' = 200'$ 

Westlea Dr

Union St

East St

Penn St

Walnut St

Jersey St

Jersey St

Cherry St

Union St

Mill St

Poplar St

Shamrock Blvd

Union Street Closed. No Access to SR 32 at this location.









Retaining Wall  
Req'd.

**Stultz-Stanley House  
Individually Eligible  
Parcel**

Impact to  
Parking

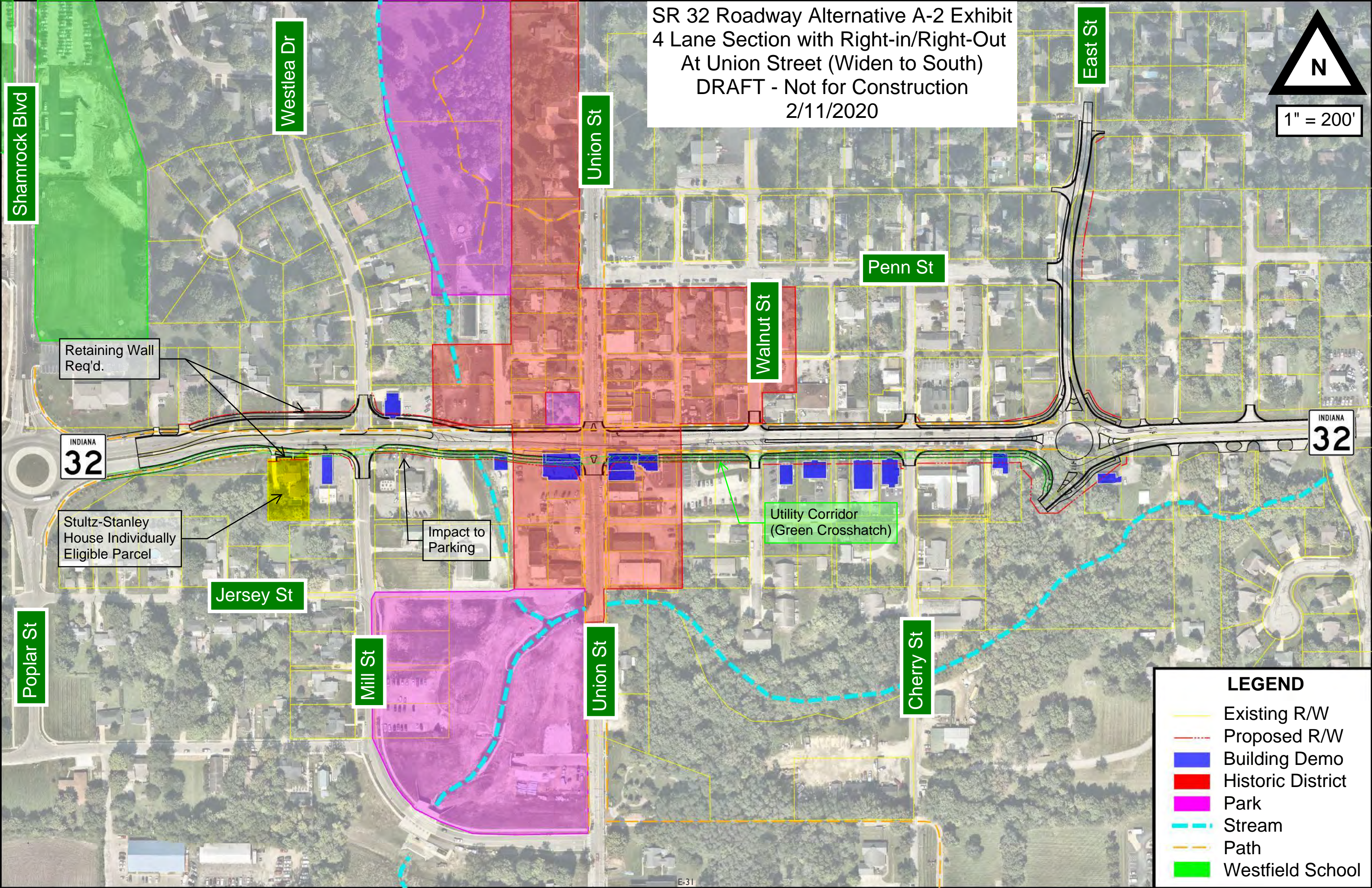
Utility Corridor  
(Green Crosshatch)

## LEGEND

-  Existing R/W
-  Proposed R/W
-  Building Demo
-  Historic District
-  Park
-  Stream
-  Path
-  Westfield School



SR 32 Roadway Alternative A-2 Exhibit  
4 Lane Section with Right-in/Right-Out  
At Union Street (Widen to South)  
DRAFT - Not for Construction  
2/11/2020



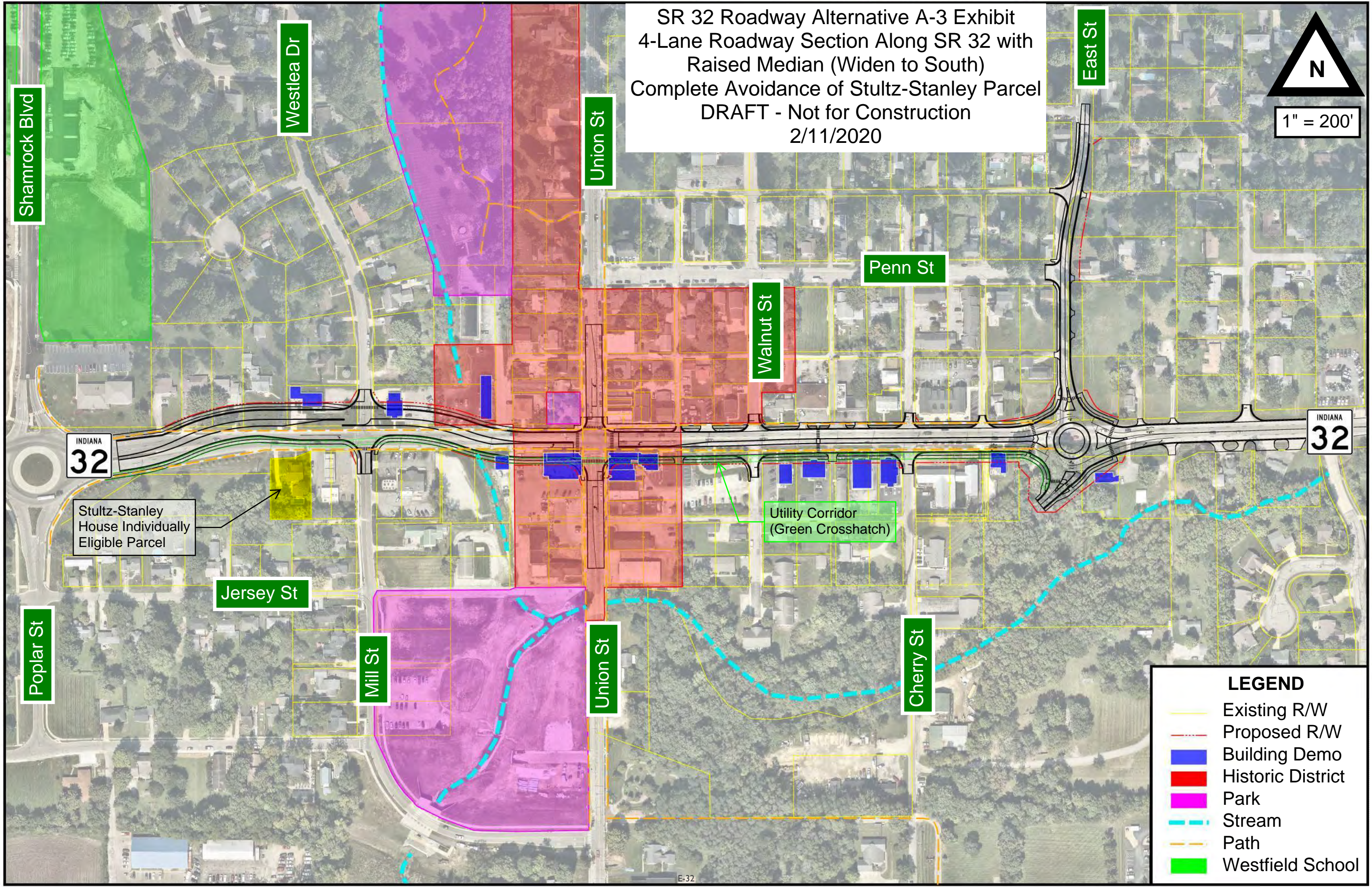
**LEGEND**

- Existing R/W
- Proposed R/W
- Building Demo
- Historic District
- Park
- Stream
- Path
- Westfield School



SR 32 Roadway Alternative A-3 Exhibit  
4-Lane Roadway Section Along SR 32 with  
Raised Median (Widen to South)  
Complete Avoidance of Stultz-Stanley Parcel  
DRAFT - Not for Construction  
2/11/2020

1" = 200'



Stultz-Stanley  
House Individually  
Eligible Parcel

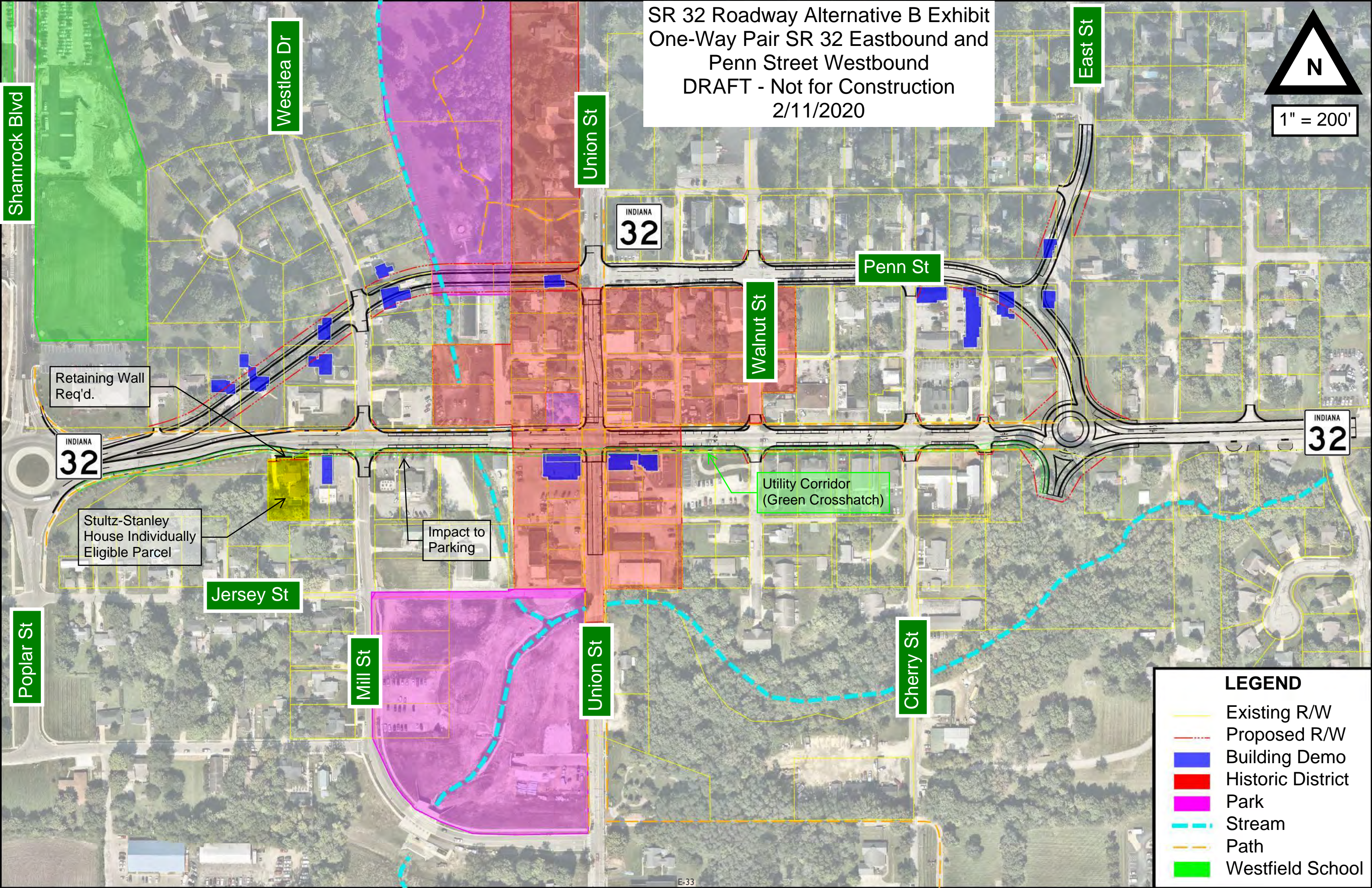
Utility Corridor  
(Green Crosshatch)

**LEGEND**

- Existing R/W
- Proposed R/W
- Building Demo
- Historic District
- Park
- Stream
- Path
- Westfield School



SR 32 Roadway Alternative B Exhibit  
One-Way Pair SR 32 Eastbound and  
Penn Street Westbound  
DRAFT - Not for Construction  
2/11/2020

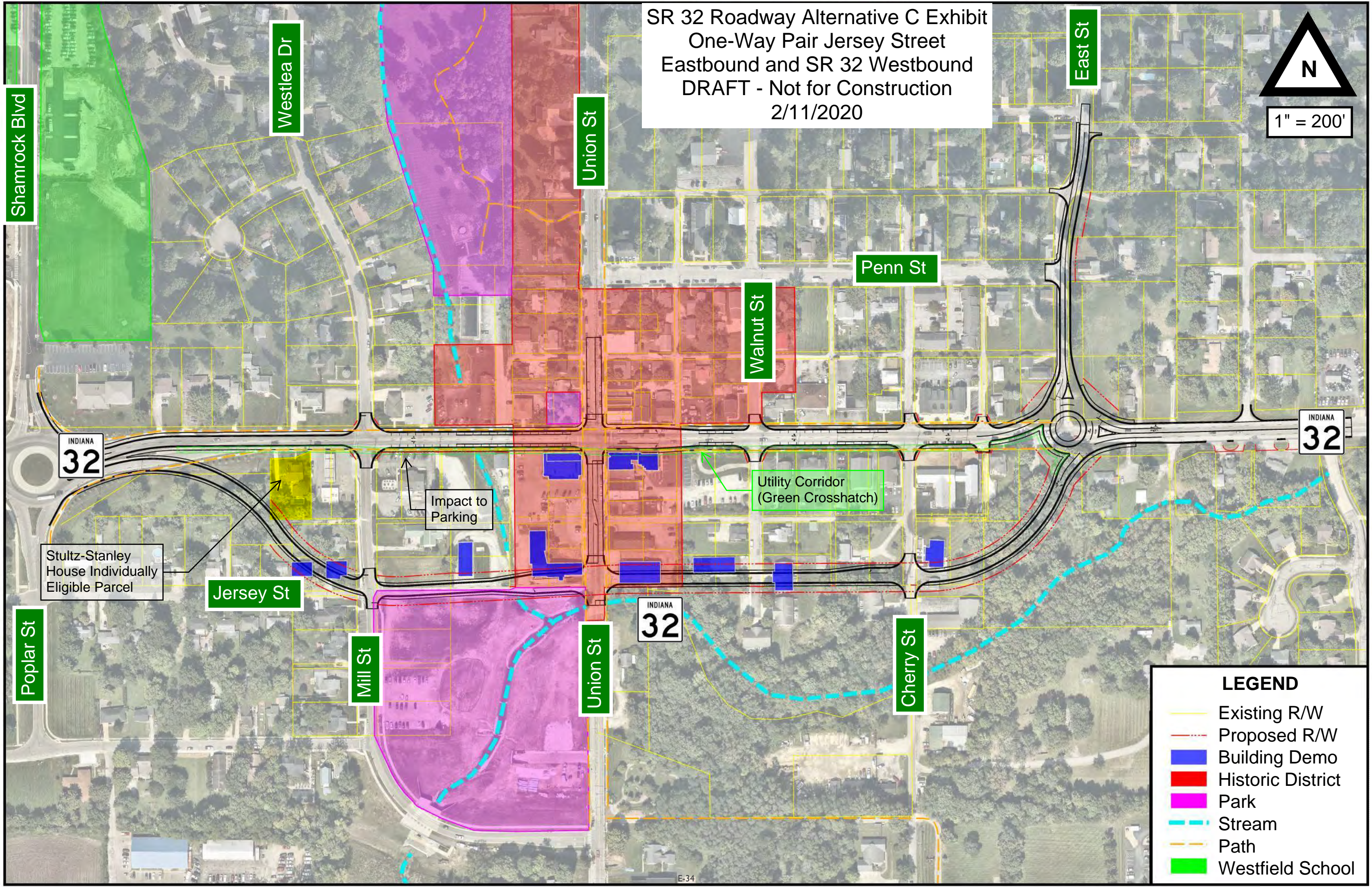
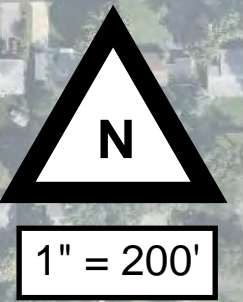


**LEGEND**

- Existing R/W
- Proposed R/W
- Building Demo
- Historic District
- Park
- Stream
- Path
- Westfield School



SR 32 Roadway Alternative C Exhibit  
One-Way Pair Jersey Street  
Eastbound and SR 32 Westbound  
DRAFT - Not for Construction  
2/11/2020



**LEGEND**

- Existing R/W
- Proposed R/W
- Building Demo
- Historic District
- Park
- Stream
- Path
- Westfield School



# Appendix C

# **Traffic Operations Analysis**

## **SR 32 Westfield Reconstruction**

---

**Prepared for:**

**Indiana Department of Transportation (INDOT)  
City of Westfield, Indiana**

**May 30, 2019**



AMERICAN  
**STRUCTUREPOINT**  
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7260 SHADELAND STATION  
INDIANAPOLIS, INDIANA 46256  
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[www.structurepoint.com](http://www.structurepoint.com)



# Traffic Operations Analysis

## SR 32 Westfield Reconstruction

US 31 to East Street  
City of Westfield, Indiana

May 30, 2019

I certify that this TRAFFIC IMPACT STUDY has been prepared by me or under my immediate supervision and that I have experience and training in the field of traffic and transportation engineering.

 5/30/2019

Patrick M. O'Connor, PE, PTOE

Indiana Registration #PE11600579



 5/30/2019

Gannon M. Grimmer, PE

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- Appendix D – Turn Lane Warrant Analysis**
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- Appendix F – Conceptual Layouts**

## Executive Summary

### Study Purpose and Scope

The purpose of this Traffic Operations Analysis (TOA) is to evaluate the future year conditions for the proposed widening of SR 32 in Westfield, IN. The study consists of three (3) roadway alignment alternatives and will determine the required cross-sections and intersection geometrics for each alternative. The traffic analysis also accounts for anticipated redevelopment on SR 32 near Union Street and potential future development on SR 32 west of US 31.

### Traffic Forecast

Traffic has been forecasted by first collecting base year (2019) traffic volumes, then applying an annual linear background traffic growth rate of 1.0% per year to obtain Opening Year 2022 and Design Year 2042 no-build (background) traffic volumes. Additionally, background developments anticipated to be completed prior to the Opening Year 2022 west of US 31 were included in the no-build analysis. New site trips generated by the anticipated future redevelopment along SR 32 in downtown Westfield were added to the background volumes to project Opening Year 2022 and Design Year 2042 build traffic volumes.

### Traffic Signal Warrant Analysis

A traffic signal warrant analysis was completed for the following intersections:

- Penn Street & Union Street (Alternative B) [Met]
- Jersey Street & Union Street (Alternative C) [Met]

### Capacity Analysis

The capacity analysis for the signalized and stop control intersections was performed using Synchro (Version 9.2). The capacity analysis for the roundabout intersections was performed using SIDRA (Version 8). The operating conditions of intersections were considered to be acceptable if found to operate at LOS D or better for the overall intersection, with no approach operating worse than LOS E. Capacity improvements are identified for the locations not meeting the criteria. Improvements were also recommended if the 95<sup>th</sup> percentile queue lengths were determined to have an adverse impact on corridor traffic operations.

### Findings and Recommendations

Based on capacity analysis and field observations of the existing conditions, SR 32 in downtown Westfield is known to experience congestion during the 2019 AM and PM peak hours. The Synchro analysis has shown that the 95<sup>th</sup> percentile queue length at SR 32 & Union Street exceeds 950 feet for the westbound approach in the AM and 900 feet for the eastbound approach in the PM. Due to the extensive queuing on SR 32 at Union Street, traffic flow is impeded at other driveways and major intersections along the corridor. In particular, the Poplar Street/Shamrock Boulevard roundabout is negatively impacted when slowed or stopped vehicles on SR 32 create a gridlock and prevent other vehicles from entering the roundabout. Slowed/stopped traffic through a roundabout compromises the safety of the intersection as drivers expectations change and typical gaps in traffic are no longer available. Since the north leg of the roundabout provides access to Riverview Health and the Westfield Intermediate and Middle Schools, safety at the roundabout is of the utmost concern.



By the projected Opening Year (2022) of the project, development is expected to be in place along SR 32 west of US 31. The development is anticipated to increase traffic volumes on SR 32 in downtown Westfield, which is expected to worsen the aforementioned conditions. During the Opening Year 2022 (Scenario 2) AM and PM peak hours, the Synchro analysis shows that several movements will operate at LOS F and the 95<sup>th</sup> percentile queue lengths exceed 1,000 feet for the respective peak directions. Widening of SR 32 will be required in order to mitigate the congestion issues.

Based upon the analysis of the design alternatives and the recommended geometrics, all alternatives are anticipated to operate within the level of service, delay, and queue standards established at the outset of this study for Design Year 2042 Build (Scenario 5). These findings will be included in further studies and analysis which are anticipated to analyze the full impacts of these scenarios.

The 4-lane design alternative with access management (Scenario 5A) is anticipated to result in fewer stops during both the AM and PM peak scenarios when compared to the one-way pair options (Scenarios 5B and 5C) based on the Synchro network performance measures. In general, the results indicate that all three design alternatives are anticipated to result in improved operations along SR 32. The two one-way pair options are anticipated to improve the conditions as compared to the no-build scenario, with neither option being superior.

## 1.0 Study Purpose and Scope

### 1.1 Purpose

The purpose of this Traffic Operations Analysis (TOA) is to evaluate the future year conditions for the proposed widening of SR 32 in Westfield, IN. The study consists of three (3) roadway alignment alternatives and will determine the required cross-sections and intersection geometrics for each alternative. The limits of the traffic analysis along SR 32 are bounded by the US 31 interchange and East Street to the west and the east, respectively. The study area is shown on **Figure 1.1**. The traffic analysis also accounts for anticipated redevelopment on SR 32 near Union Street and potential future development on SR 32 west of US 31.

### 1.2 Scope

The traffic analysis focuses on 11 intersections along SR 32 or in close proximity to the roadway, including a proposed extension of Jersey Street from Union Street to East Street. The study intersections are listed below in **Table 1.1**.

**Table 1.1 – Study Intersections**

No.	Intersection
1	SR 32 & US 31
2	SR 32 & Poplar Street / Shamrock Boulevard
3	SR 32 & Mill Street / Westlea Drive
4	SR 32 & Union Street
5	SR 32 & Walnut Street
6	SR 32 & Cherry Street
7	SR 32 & East Street
8	Penn Street & East Street
9	Penn Street & Union Street
10	Jersey Street & Union Street
11	Jersey Street (future) & Cherry Street

A capacity analysis was performed for the scenarios listed in **Table 1.2**. The study scenarios focus on traffic volumes for the Existing Year 2019, an Opening Year 2022, and a Design Year 2042. The SR 32 design alternatives that were evaluated are shown in **Table 1.3**.



**Table 1.2 – Study Scenarios**

Scenario	Traffic Volumes	Description
1	Existing Year 2019	No-Build*
2	Opening Year 2022	No-Build*
3	Opening Year 2022	Build
4	Design Year 2042	No-Build*
5	Design Year 2042	Build

*\*No-Build assumes no changes to existing SR 32 with only background growth*

**Table 1.3 – SR 32 Design Alternatives**

Alternative	Roadway Network
A	SR 32 4-Lane Section (with Access Management)
B	One-Way Pair (SR 32 EB, Penn Street WB)
C	One-Way Pair (SR 32 WB, Jersey Street EB)

A traffic signal warrant analysis was conducted for the following intersections based on the guidelines provided in the *Indiana Manual on Uniform Traffic Control Devices (MUTCD)*:

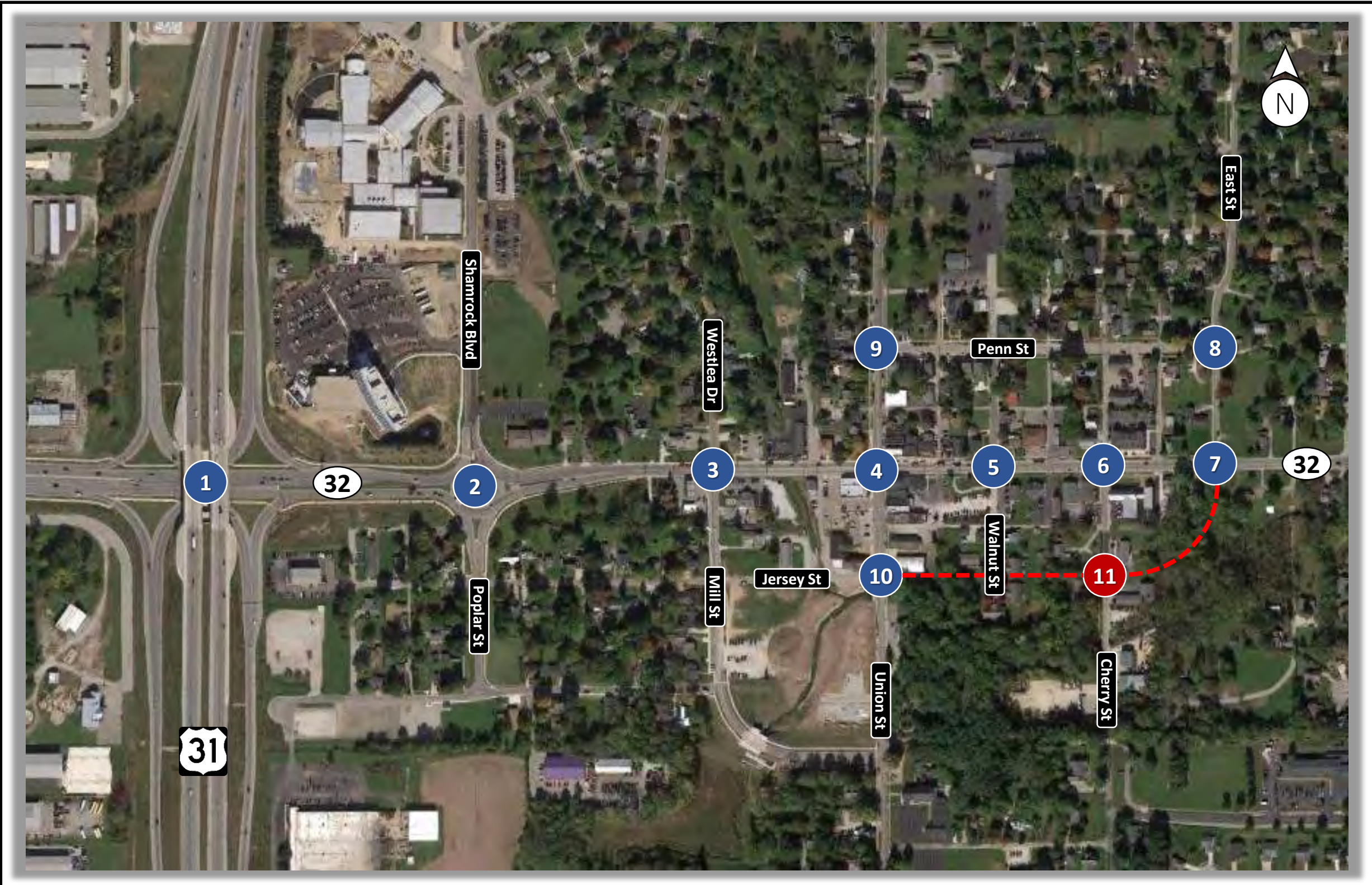
- Penn Street & Union Street (Alternative B)
- Jersey Street & Union Street (Alternative C)

A turn lane warrant analysis was conducted for the following intersections based on the guidelines provided in the *Indiana Design Manual*:

- SR 32 & Mill Street / Westlea Drive
- SR 32 & Walnut Street
- SR 32 & Cherry Street

All analysis results and recommendations have been summarized and documented in this Traffic Operations Analysis.





 <p>AMERICAN <b>STRUCTUREPOINT</b> INC.</p>	<p><b>Legend</b></p> <p> <span style="border: 1px solid blue; border-radius: 50%; padding: 2px 5px;">1</span> Intersection Number (Existing)         <span style="border: 1px solid red; border-radius: 50%; padding: 2px 5px;">1</span> Intersection Number (Future)         <span style="color: red; font-weight: bold;">---</span> Jersey Street Future Extension       </p>	<p>SR 32 Reconstruction Westfield, IN</p>	<p><u>Figure 1.1</u> Study Area</p>
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## 2.0 Background Information

The following sections document the current and proposed roadway conditions of the streets within the study area. The existing lane configurations and traffic control types are shown on **Figure 2.1**.

### 2.1.1 SR 32

SR 32 is an east/west roadway that is currently classified as a Principal Arterial in the vicinity of the study area. Through the study segment, SR 32 generally consists of a two-lane section that widens at major intersections to provide dedicated left-turn lanes. The posted speed limit on SR 32 is 30 mph. On-street parking is currently allowed between Mill Street and East Street.

### 2.1.2 US 31

US 31 is a north/south highway that is currently classified as a Principal Arterial. The US 31 & SR 32 single-point urban interchange serves as a major access point to downtown Westfield. The interchange currently has excess capacity and is not expected to require any improvements as part of the SR 32 widening project.

### 2.1.3 Poplar Street / Shamrock Boulevard

The intersection of SR 32 & Poplar Street / Shamrock Boulevard operates as a multi-lane roundabout with dedicated right-turn lanes on all approaches with the exception of eastbound. Poplar Street (south leg) is classified as a Minor Collector that provides access to residential and commercial land use areas. A Poplar Street extension is anticipated to be constructed in the future to provide connectivity south to 161<sup>st</sup> Street. Shamrock Boulevard (north leg) is classified as a Local Road that provides access to Riverview Health, Westfield Intermediate School, and Westfield Middle School.

### 2.1.4 Mill Street / Westlea Drive

The intersection of SR 32 & Mill Street / Westlea Drive is two-way stop control, and no turn lanes are provided at any of the approaches.

### 2.1.5 Union Street

Union Street is a north/south roadway that is currently classified as a Major Collector. Union Street is one of Westfield's most highly-traveled roads and goes through the downtown core area. The intersection of SR 32 & Union Street is signalized with dedicated left-turn lanes provided on all approaches; however, the storage provided is limited to only 2-3 vehicles (50'). The left-turn phasing at the signal was recently modified near the end of 2018 to provide protected-permissive left turns for all left-turn movements.

Due to the existing peak hour congestion along SR 32, most left turns onto SR 32 occur at Union Street. Left-turn volumes at the adjacent unsignalized intersections are low during the peak hours, which indicates that gaps in traffic are not available and forces drivers to use Union Street. The posted speed limit on Union Street is 20 mph.

### 2.1.6 Walnut Street

The intersection of SR 32 & Walnut Street is two-way stop control, and no turn lanes are provided at any of the approaches.

### 2.1.7 Cherry Street

The intersection of SR 32 & Cherry Street is two-way stop control, and no turn lanes are provided at any of the approaches.

### **2.1.8 East Street**

The intersection of SR 32 & East Street is one-way stop control, and no turn lanes are provided at any of the approaches. East Street is classified as a Major Collector with a speed limit of 20 mph in the vicinity of the study area.

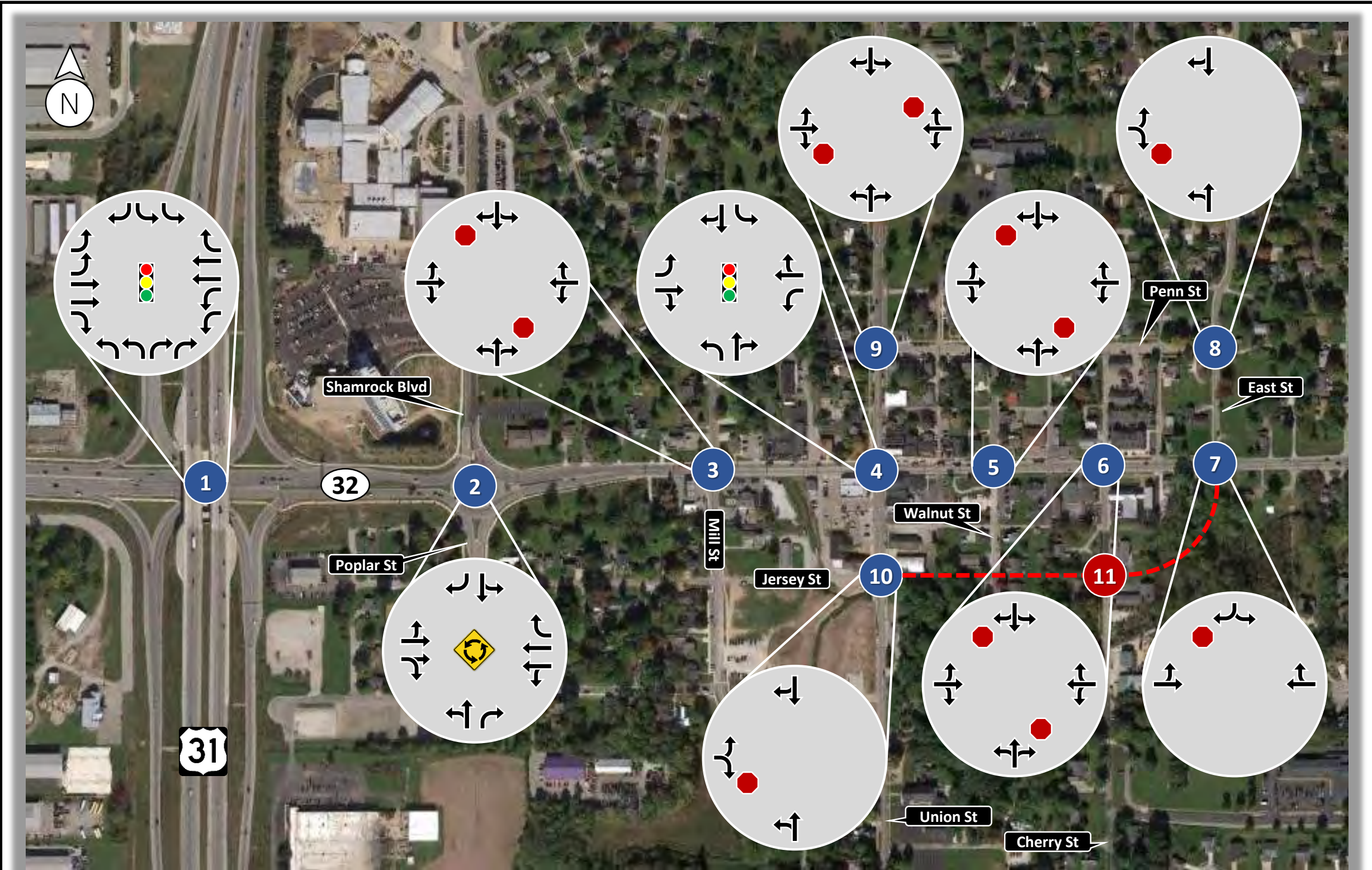
### **2.1.9 Penn Street**

Penn Street is a two-lane east/west roadway north of SR 32 with parking allowed on both sides of the street. The intersections along Penn Street currently operate as stop control.

### **2.1.10 Jersey Street**

Jersey Street is a two-lane east/west roadway south of SR 32 that currently spans from Poplar Street to Union Street. A planned extension of Jersey Street will create a new alignment that spans from Union Street to East Street. The traffic analysis for this study assumes that the future alignment will be constructed by Opening Year 2022.





	<p><b>Legend</b></p> <div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%;"> <p><span style="border: 1px solid blue; border-radius: 50%; padding: 2px;">1</span> Existing Intersection</p> <p><span style="border: 1px solid red; border-radius: 50%; padding: 2px;">1</span> Future Intersection</p> </div> <div style="width: 50%;"> <p> Traffic Signal</p> <p> Stop Control</p> </div> <div style="width: 50%;"> <p> Roundabout</p> <p> Jersey St Extension</p> </div> </div>	<p>SR 32 Reconstruction Westfield, IN</p>	<p>Figure 2.1 Existing Lane Configurations</p>
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## 3.0 Traffic Forecast

Traffic has been forecasted by first collecting base year (2019) traffic volumes, then applying an annual linear background traffic growth rate to obtain Opening Year 2022 and Design Year 2042 no-build (background) traffic volumes. Additionally, new site trips generated by the anticipated future developments were added to the background volumes to project Opening Year 2022 and Design Year 2042 build traffic volumes. The following sections of the report provide greater detail of these steps.

### 3.1 Existing Traffic Data

Turning movement counts were collected by American Structurepoint on Tuesday, December 11, 2018. The traffic data was captured during a typical, non-holiday week during the school year for the following peak time periods: 7:00 AM – 9:00 AM, 4:00 PM – 6:00 PM. The Existing Year 2019 traffic volumes are shown on **Figure 3.1**. The raw data from the traffic counts is provided in **Appendix A**.

Daily traffic counts were also collected at three (3) locations along SR 32 in order to assess the daily traffic patterns for the corridor. The Average Daily Traffic (ADT) volumes are shown in **Table 3.1**.

**Table 3.1 – SR 32 Average Daily Traffic**

Location	2-Way ADT
SR 32, east of Poplar Street	15,100
SR 32, btw Walnut Street and Cherry Street	16,700
SR 32, east of East Street	17,300

INDOT provided traffic data for the weekend of March 9-10, 2019, at the intersection of SR 32 & Union Street in order to provide a comparison with weekday peak hour traffic. The City of Westfield had indicated that weekend peak hour traffic characteristics may present different turning movement magnitudes than weekday peak hour traffic; therefore, a comparison of the data will help identify the potential need for an evaluation of weekend traffic operations. A comparison of the peak hour traffic volumes at SR 32 & Union Street are shown in **Table 3.2**. The weekend traffic data is provided in **Appendix A**.

**Table 3.2 – SR 32 & Union Street Peak Hour Traffic Data Comparison**

Day of Week / Peak Hour	Total Intersection Volume	Percent Difference (%)
Weekday / PM	2,040	--
Saturday / Midday	1,650	-19%
Sunday / Midday	1,230	-40%

The peak hour traffic data comparison at SR 32 & Union Street shows that Saturday peak traffic volumes are approximately 19% lower than the PM peak hour traffic volumes on a typical weekday. Based on a review of the turning movement volumes between the respective peak hours, none of the turning movements from



the weekend count data were significantly higher than the weekday volumes, which indicates that additional analysis to account for weekend traffic characteristics is not required. The weekday AM and PM peak hour traffic volumes will dictate the worst-case scenario for intersection improvement needs.

### 3.2 Background Traffic Growth

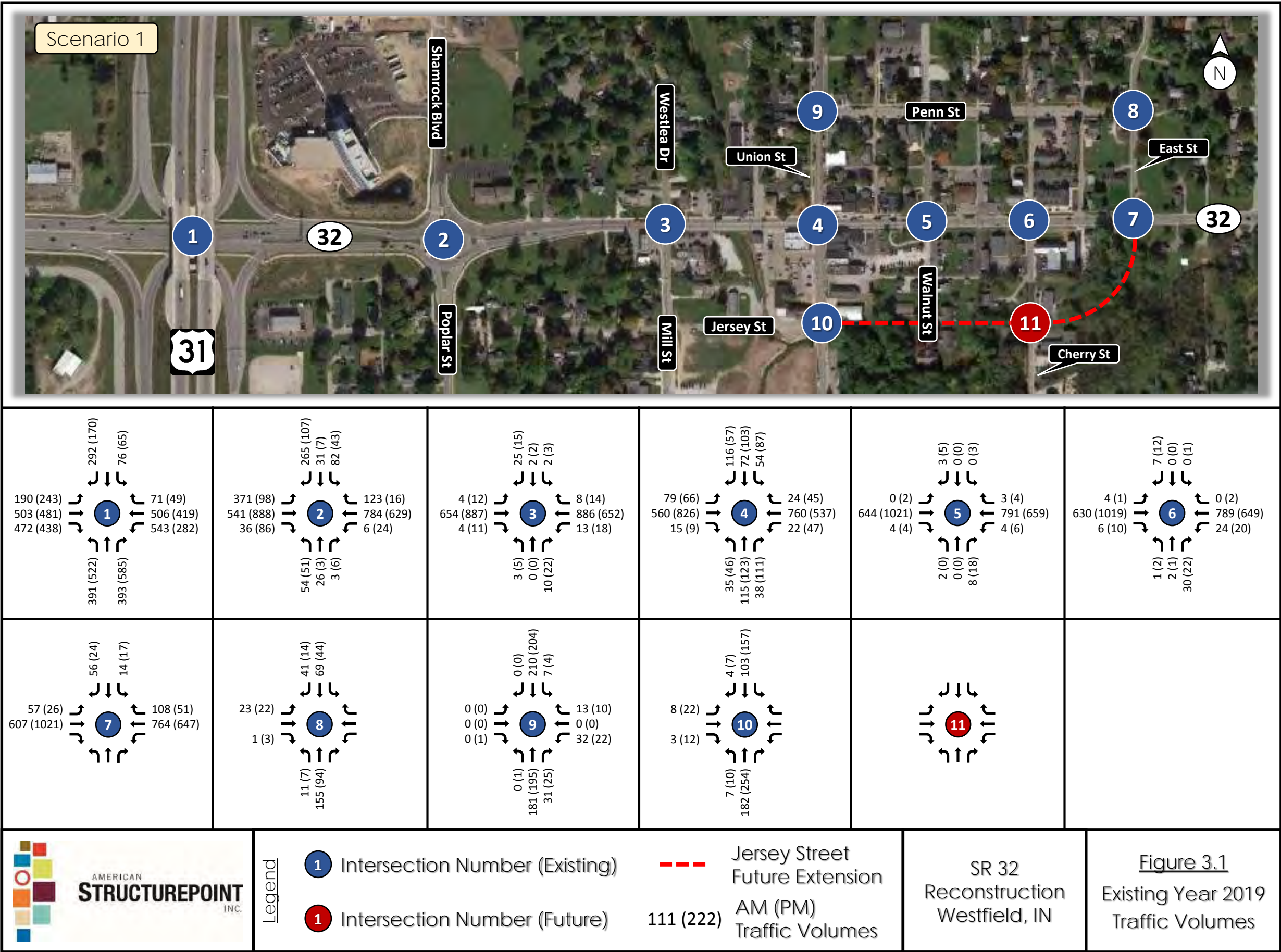
Background traffic growth for the study area was determined based on travel demand output information provided by the INDOT Technical Planning Support & Programming Division. Per the INDOT travel demand model, the SR 32 study segment is anticipated to incur a 0.896% compound annual growth rate. In order to be conservative with the traffic analysis, an annual linear growth rate of 1.0% was used for this study. The 1.0% annual linear growth rate was approved by INDOT.

The traffic projections for background growth also include future developments west of US 31 in the vicinity of Wheeler Road and Dartown Road which are anticipated to be completed prior to the Opening Year 2022, regardless of the SR 32 project through downtown Westfield. The trip generation estimates used for these developments are based on Planned Unit Development (PUD) documents and other information provided by the City of Westfield. **Table 3.3** contains the total number of AM peak hour, PM peak hour, and Daily trips that are expected to be generated as part of the background growth. A detailed breakdown of the net new vehicle trips for each respective development area is provided in **Appendix B**.

**Table 3.3 – Future Development Background Site Trips (West of US 31)**

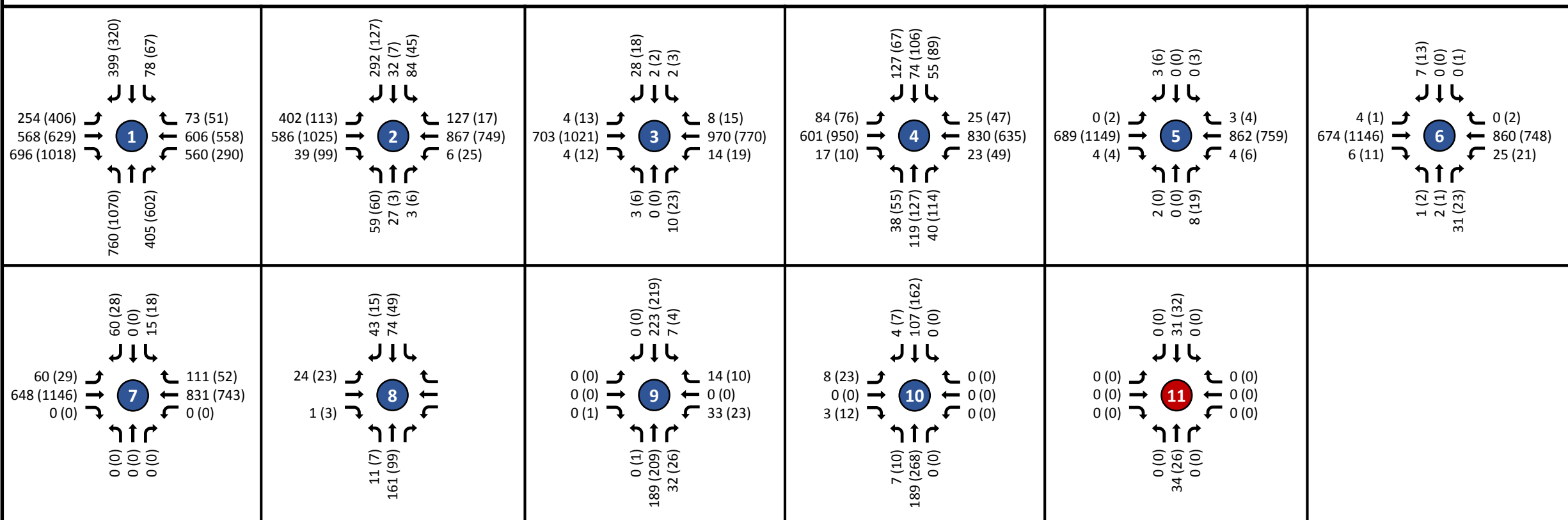
Trip Types	AM	PM	Daily
Total	1,501	3,021	33,038
Internal Capture	147	280	3,302
Pass-By	319	742	8,220
Mode-Choice Reduction	0	0	0
<b>Net New Vehicle Trips</b>	<b>1,035</b>	<b>1,999</b>	<b>21,516</b>

The Construction Year for the project is anticipated to be 2022; therefore, traffic volumes were projected for an Opening Year 2022 and a Design Year 2042 for the traffic analysis. The projected traffic volumes for the future year no-build (background) scenarios are shown on **Figure 3.2** and **Figure 3.3**, respectively.





# Scenario 2



Legend

**1** Intersection Number (Existing)

**1** Intersection Number (Future)



Jersey Street  
Future Extension  
AM (PM)  
Traffic Volumes

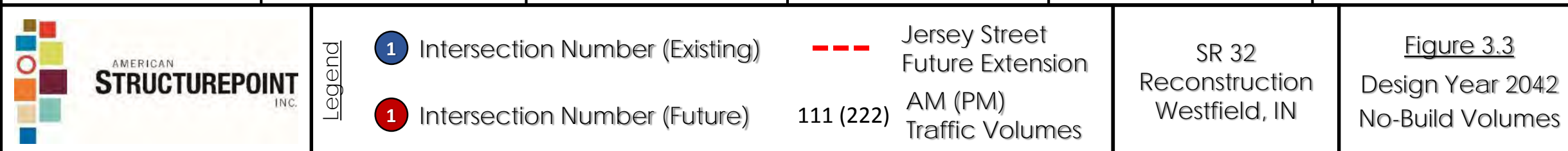
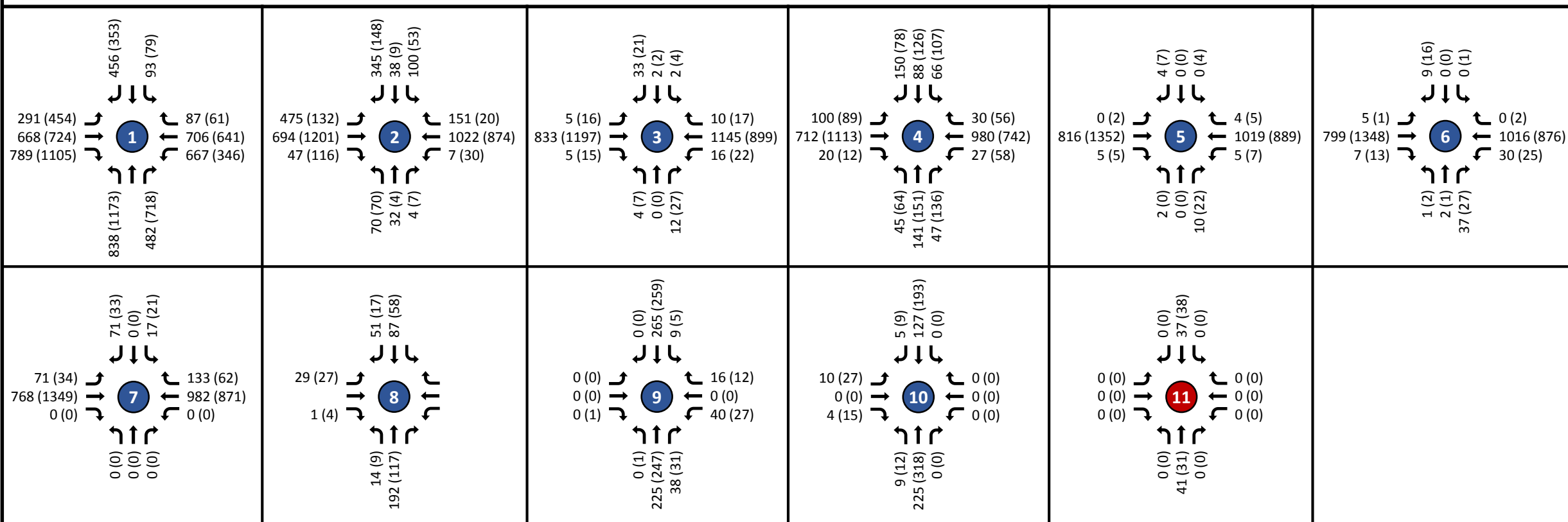
111 (222)

SR 32  
Reconstruction  
Westfield, IN

Figure 3.2  
Opening Year 2022  
No-Build Volumes



Scenario 4





### 3.3 SR 32 Redevelopment

#### 3.3.1 Trip Generation

Redevelopment is expected to occur along SR 32 as part of the widening of the roadway. At the time of this study, the redevelopment is anticipated to happen south of SR 32 with limits that are roughly bounded by Mill Street to the west and Cherry Street to the east. A map of the expected SR 32 redevelopment location is shown on **Figure 3.4**. The developments are expected to consist of the following land uses: retail, office, and residential. The Institute of Transportation Engineers (ITE) *Trip Generation Manual, 10<sup>th</sup> Edition* was used to calculate the generated trips for the anticipated future redevelopment. **Table 3.4** contains the total number of AM peak hour, PM peak hour, and Daily trips that are expected to be generated.

**Table 3.4 – SR 32 Redevelopment Trip Generation**

Trip Types	AM	PM	Daily
Total	239	560	6,709
Internal Capture	18	59	671
Pass-By	14	124	1,434
Mode-Choice Reduction	0	0	0
<b>Net New Vehicle Trips</b>	<b>207</b>	<b>377</b>	<b>4,604</b>

The trip generation projections for the redevelopment were based on information provided by the City of Westfield. The trip generation assumptions were approved by the City of Westfield and INDOT based on a design coordination meeting held on March 13, 2019. The land use projections are subject to change in the future, however, and additional analysis will be required if future site plans for these areas indicate that a higher rate of added trips will be generated during the peak hours.

Internal trips and pass-by trips were accounted for in the trip reduction process for the applicable land uses. Mode-choice reduction trips (public transit, walking, and biking) were considered inapplicable to this area, as all trips are anticipated to be vehicle-driven based on discussion with INDOT. After accounting for the internal capture and pass-by trip reductions, the resulting net new site trips are summarized in **Table 3.5**. A breakdown of the net new vehicle trips for the redevelopment is provided in **Appendix B**.

**Table 3.5 – SR 32 Redevelopment (7 acres): Net New Vehicle Trips**

Land Use Type	Size	Unit	Net New Vehicle Trips		
			AM	PM	Daily
Retail	50	KSF	26	240	2,782
Office	50	KSF	92	48	498
Residential	200	DU	90	90	1,324
<b>Total</b>			<b>208</b>	<b>378</b>	<b>4,604</b>



Note: Limits of development outlines shown on map are based information provided by the City of Westfield



Legend



SR 32 Redevelopment



Union St/Mill St development



Jersey Street  
Future Extension

SR 32  
Reconstruction  
Westfield, IN

Figure 3.4  
Map of SR 32  
Redevelopment  
Limits



### 3.3.2 Trip Distribution and Assignment

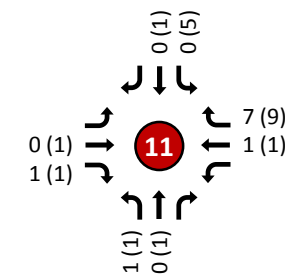
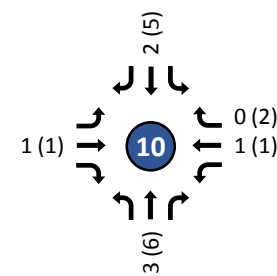
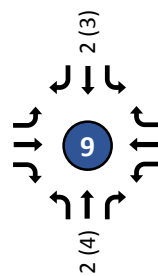
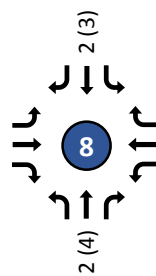
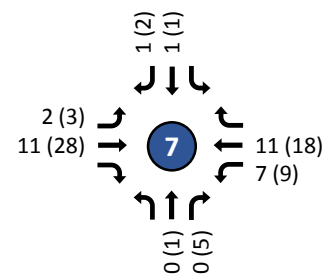
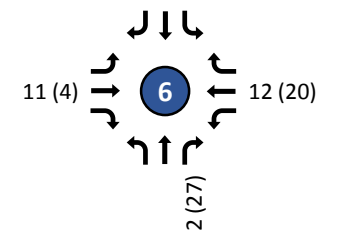
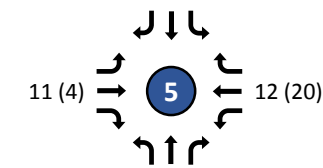
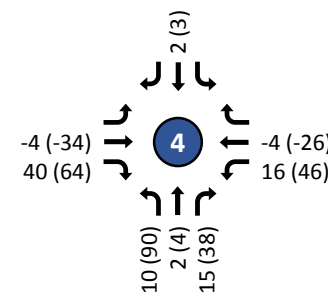
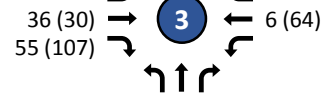
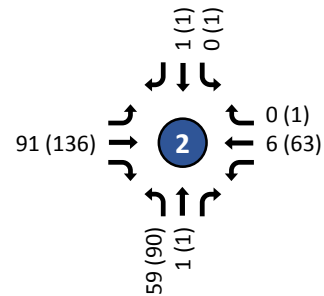
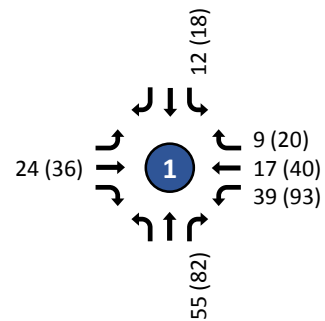
Trip distribution percentages were calculated based on Annual Average Daily Traffic (AADT) volumes along the external roadways to the study area. These percentages were then modified to take into account major origin and destination centers such as interstate access and heavy residential areas. The trip distribution percentages that were used to assign the added trips to the study area roadway network are provided in **Table 3.6**. A detailed breakdown of the trip distribution calculations is provided in **Appendix B**.

**Table 3.6 – Trip Distributions (SR 32 Redevelopment)**

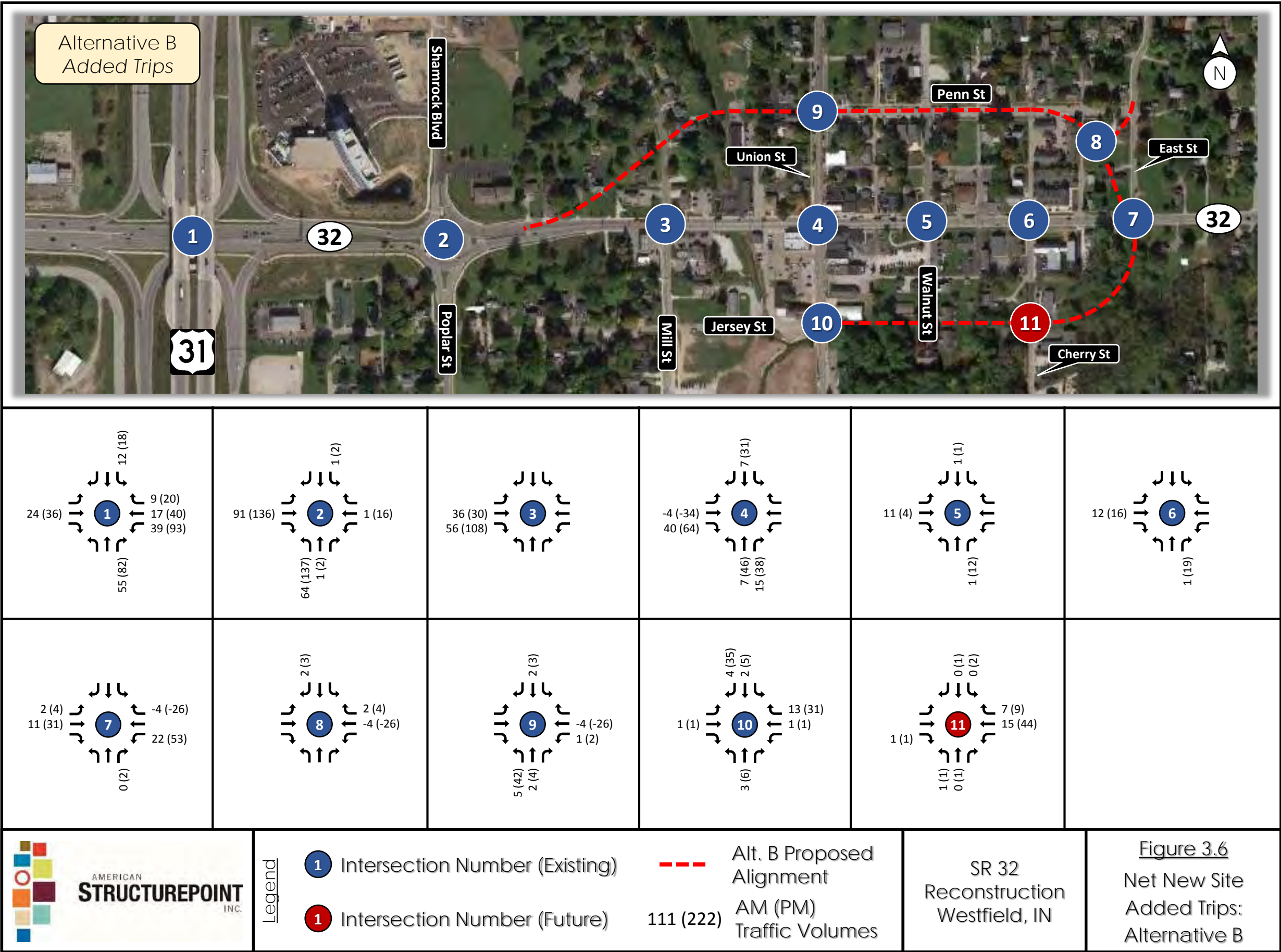
To/From	Via Roadway	Percentage
North	US 31	10%
South	US 31	46%
East	SR 32	15%
West	SR 32	20%
--	Other	9%
<b>Total</b>		<b>100%</b>

The trip distribution percentages were applied to the trip ends generated by each development and assigned to each roadway. The trip assignment was facilitated through the use of Vistro (Version 5), which assigns traffic to intersections based on manually assigned routes between each origin-destination. The net new added site trips for Design Alternative A, B, and C are shown on **Figure 3.5** through **Figure 3.7**, respectively. The site trips were added to the Opening Year 2022 No-Build and Design Year 2042 No-Build Traffic Volumes to achieve Opening Year 2022 Build and Design Year 2042 Build Traffic Volumes, which are shown on **Figure 3.8** through **Figure 3.10** (Opening Year 2022 Build), and **Figure 3.11** through **Figure 3.13** (Design Year 2042 Build), respectively for each of the design alternatives.

Alternative A  
Added Trips

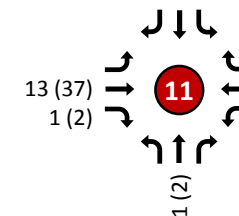
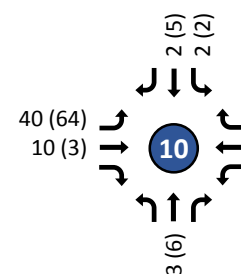
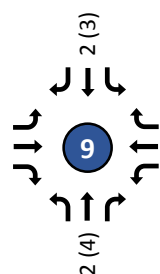
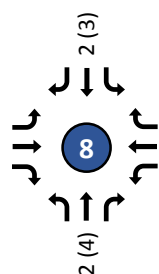
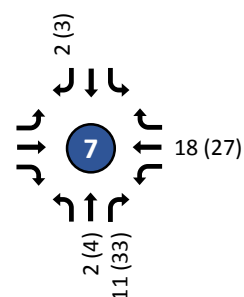
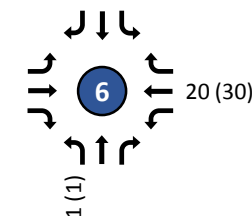
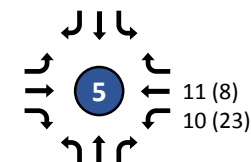
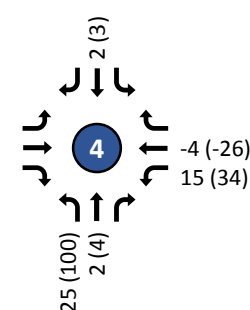
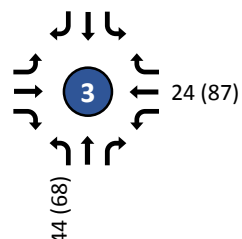
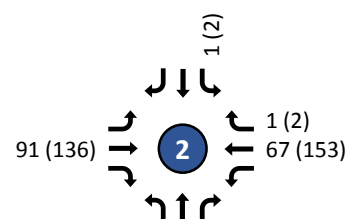
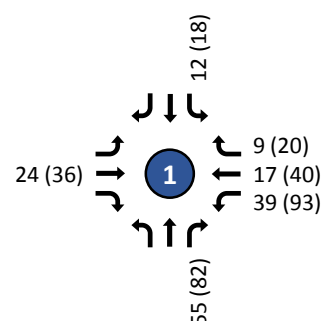
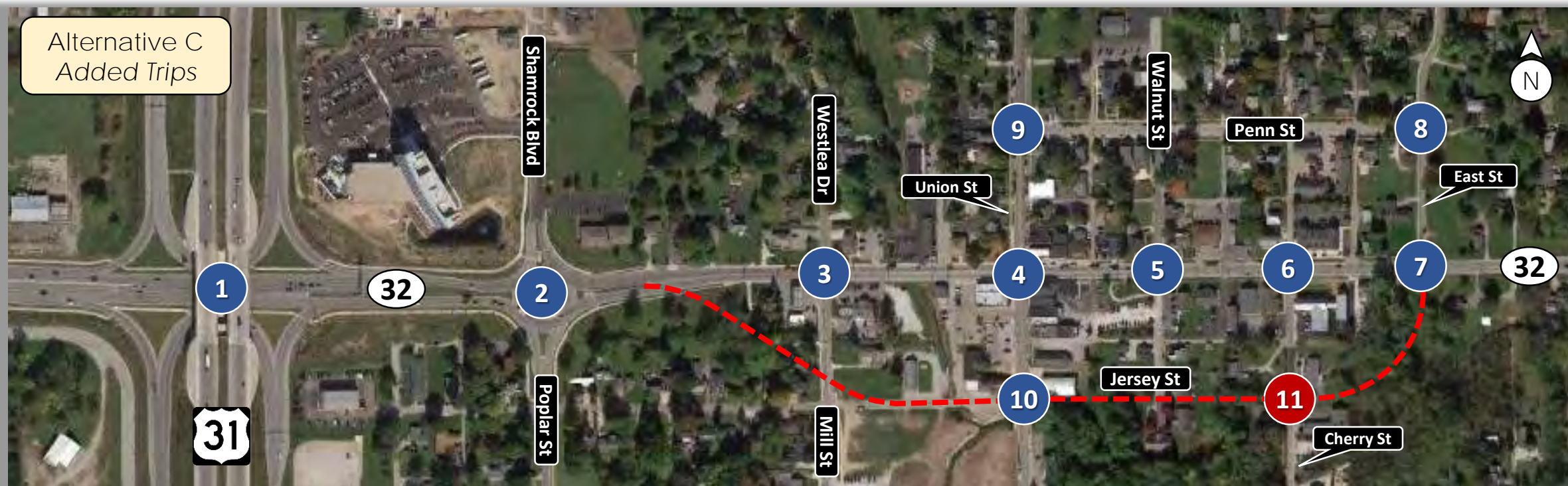








Alternative C  
Added Trips



Legend

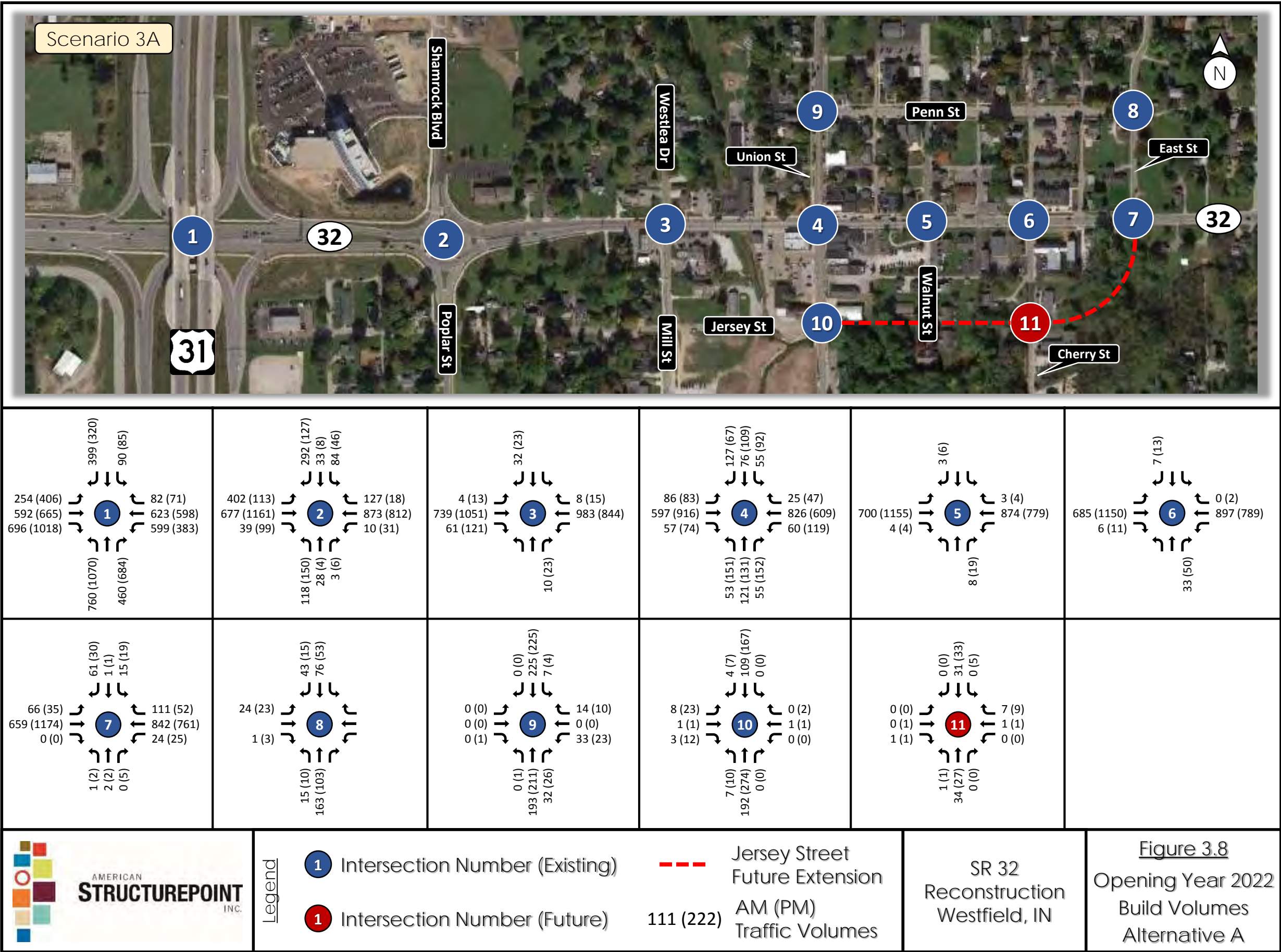
- 1 Intersection Number (Existing)
- 1 Intersection Number (Future)

--- Alt. C Proposed Alignment  
111 (222) AM (PM) Traffic Volumes

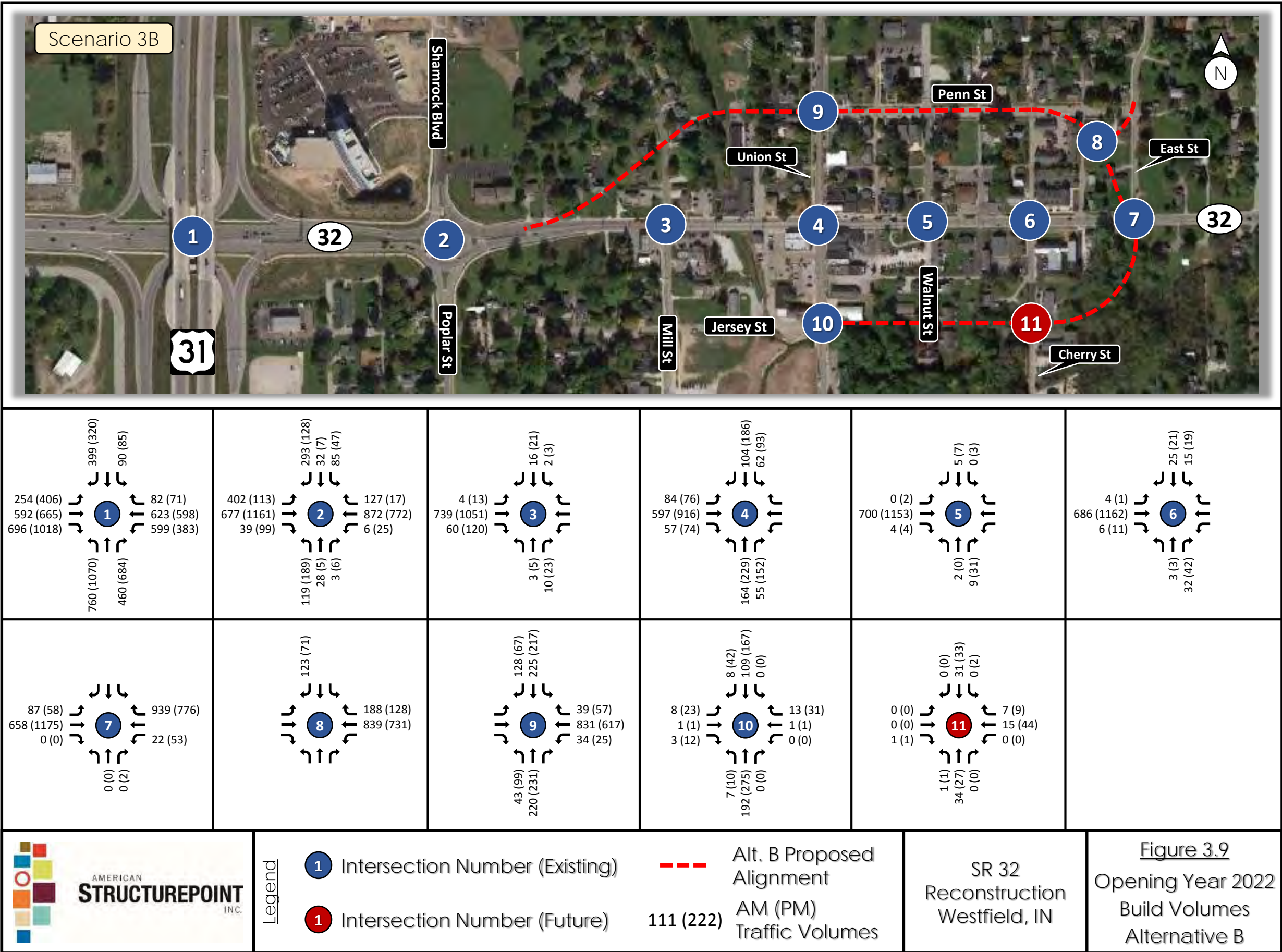
SR 32  
Reconstruction  
Westfield, IN

Figure 3.7  
Net New Site  
Added Trips:  
Alternative C

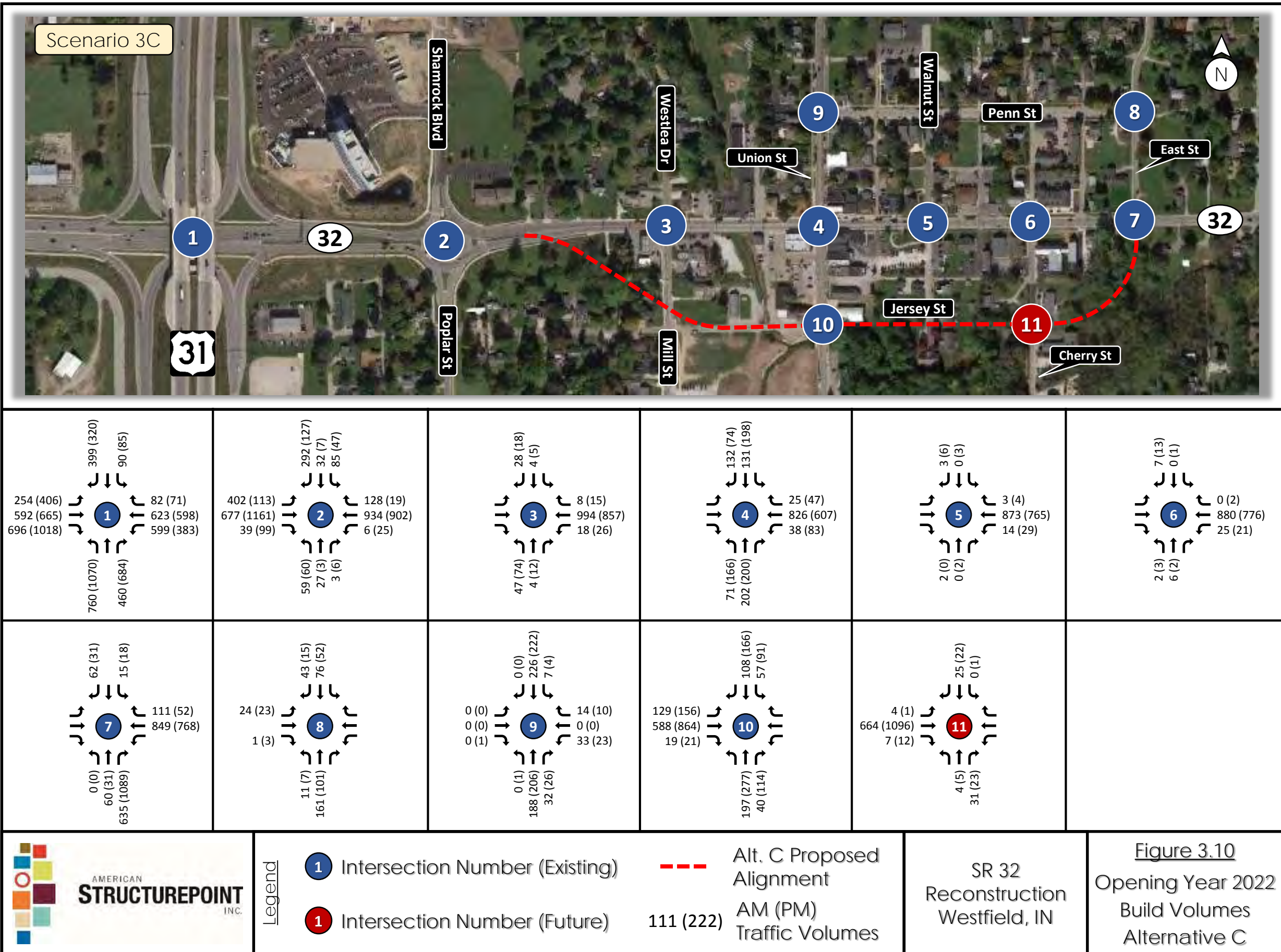




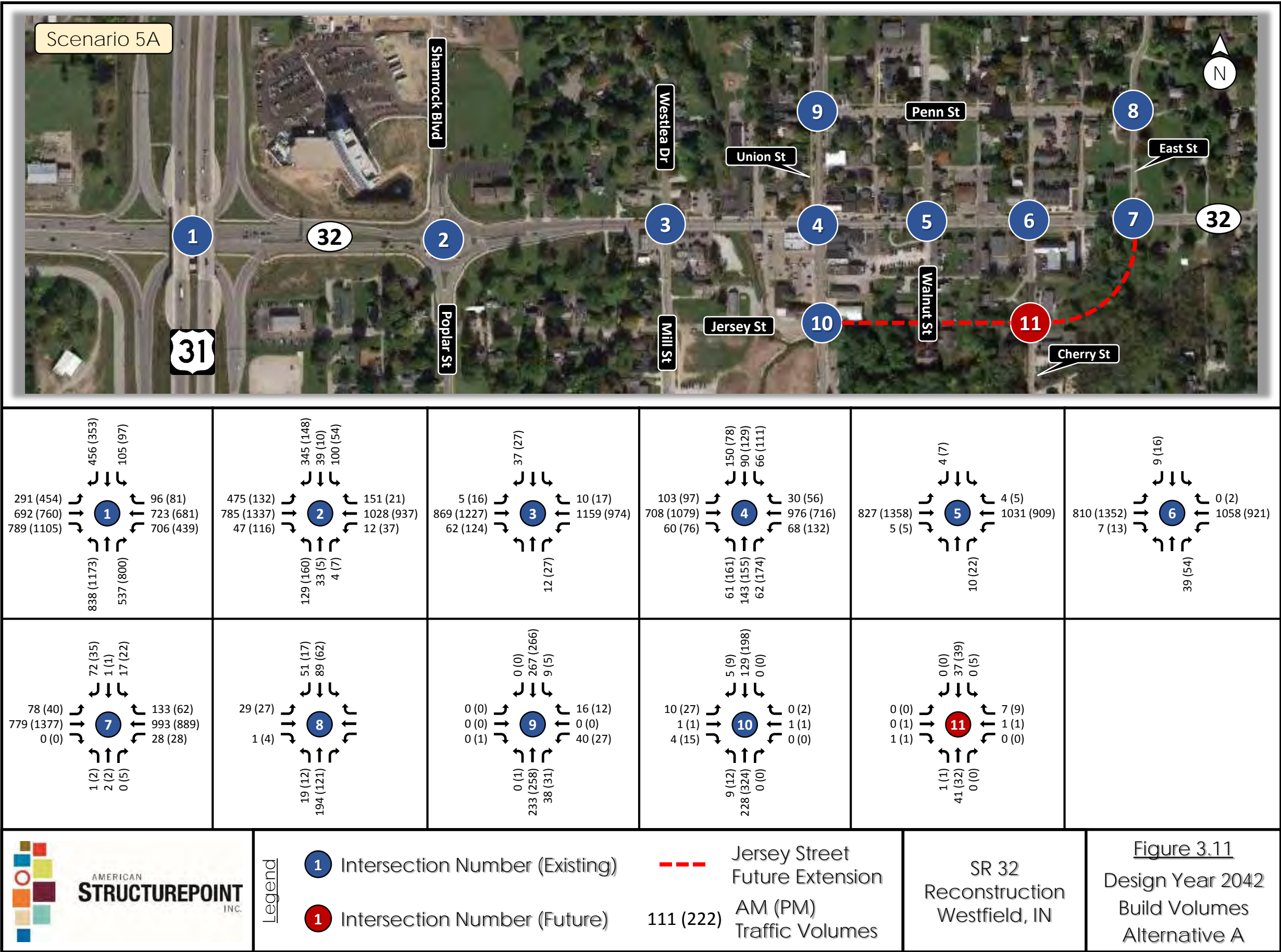




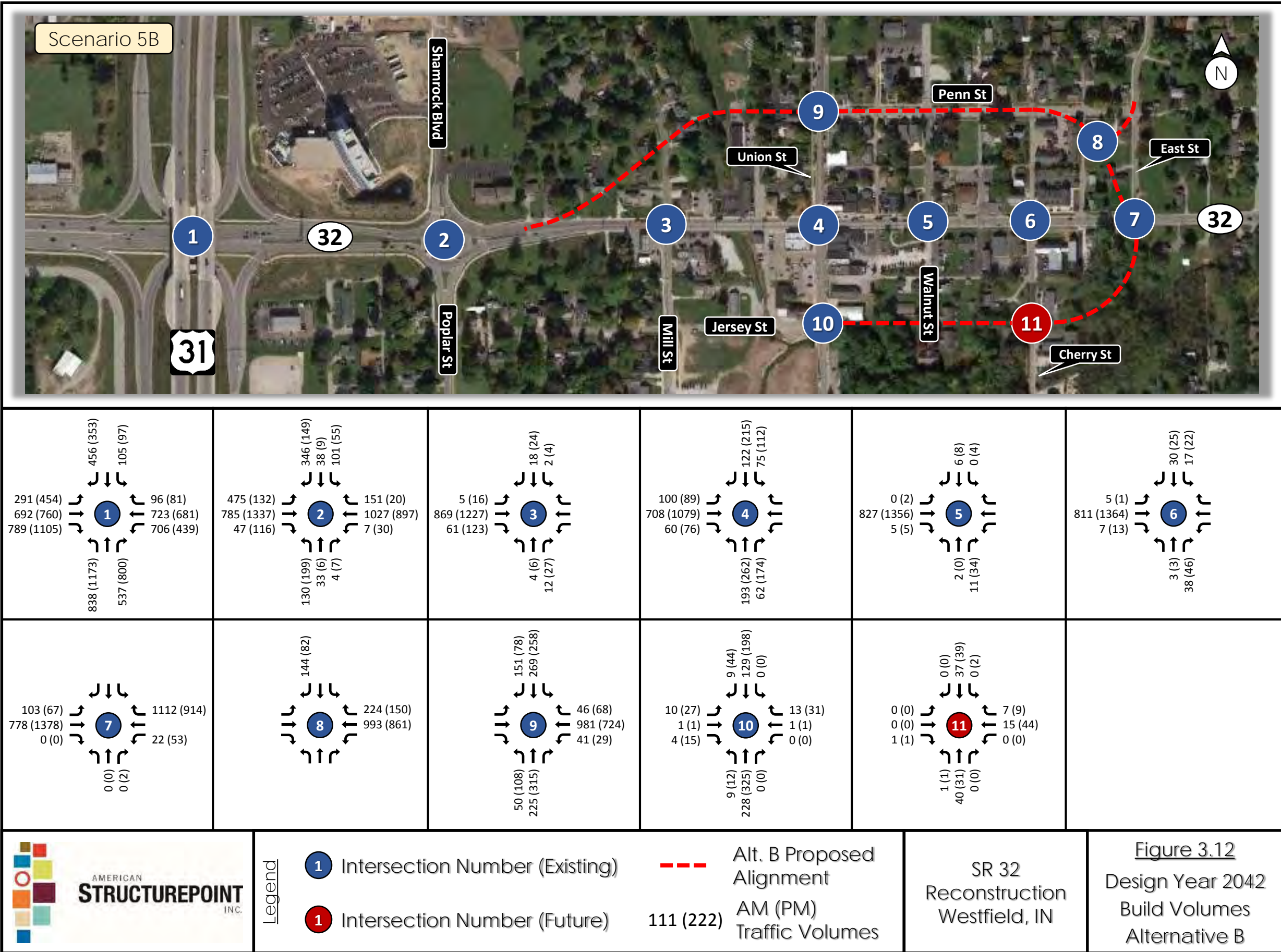




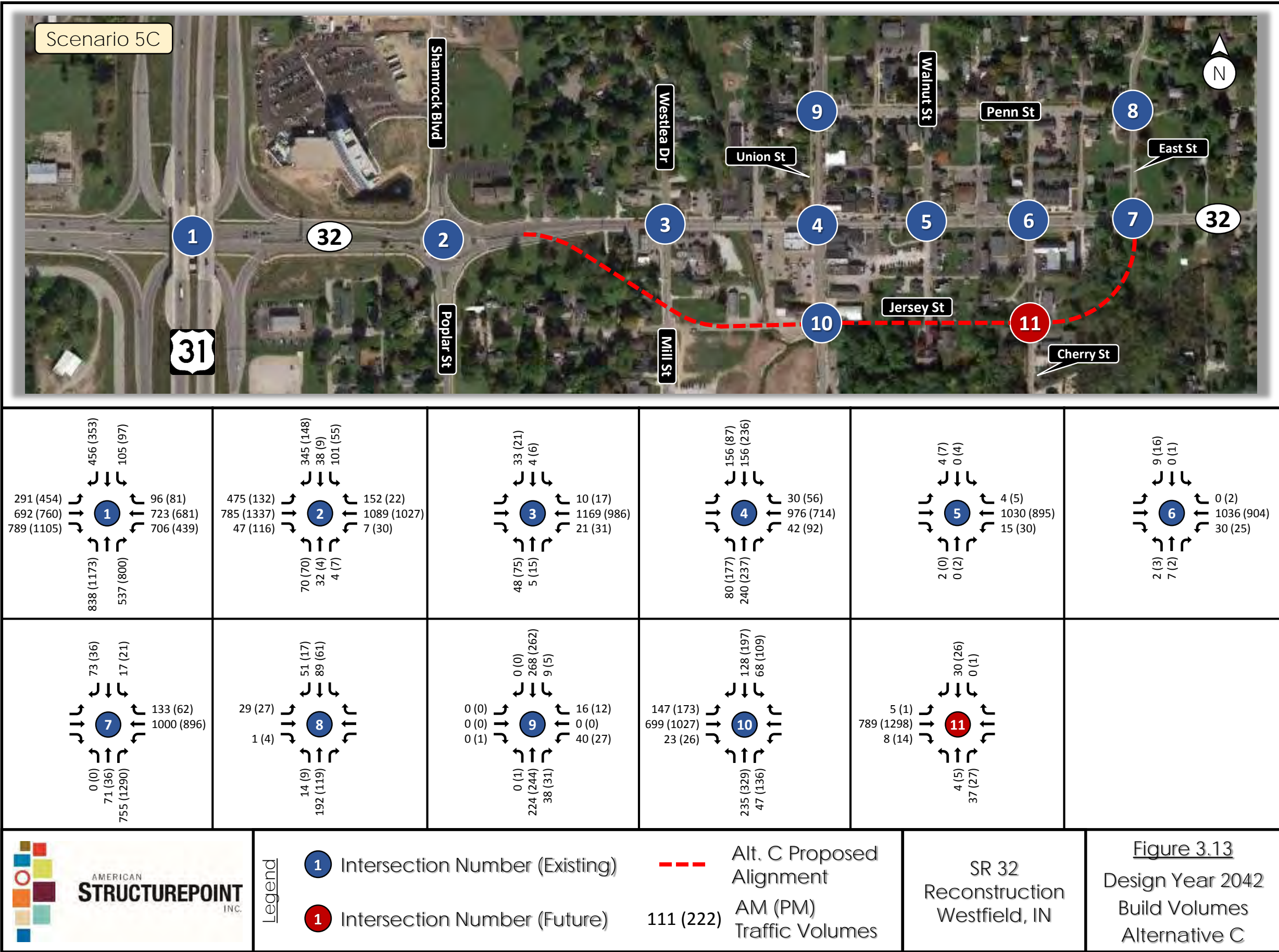














## 4.0 Traffic Signal Warrant Analysis

A traffic signal warrant analysis has been completed for the following intersections:

- Penn Street & Union Street (Alternative 2)
- Jersey Street & Union Street (Alternative 3)

The traffic signal warrant analysis is based on the guidelines presented in the *Indiana MUTCD*. Warrant 1 (utilizing the available AM and PM peak hour volumes) was considered to be the applicable warrant for this study. The remaining warrants were found to be non-applicable or the required information was not available at this time. Additional warrants and further analysis would need to be performed if either Alternative 2 or Alternative 3 was deemed the preferred option. Right turn on red (RTOR) reductions on minor lane approaches were incorporated in the analysis. A summary of the traffic signal warrant analysis is provided in **Table 4.1**. A detailed breakdown of the signal warrant analysis is provided in **Appendix C**.

**Table 4.1 – Traffic Signal Warrant Analysis**

Intersection	Signal Warrant Status
Penn Street & Union Street (Alternative 2)	Met
Jersey Street & Union Street (Alternative 3)	Met

## 5.0 Turn Lane Warrant Analysis

Based upon discussions during the Design Coordination meeting with INDOT on April 10, 2019, it was determined that INDOT's preference is to provide auxiliary lanes where possible to mitigate operational concerns during the design process. Therefore, regardless of meeting the turn-lane warrant thresholds, dedicated left-turn lanes are recommended along SR 32 for all three (3) alternatives analyzed along with dedicated right-turn lanes at the signalized intersections. Due to concerns with right-of-way and potential impacts to historic structures, the westbound right-turn lane at SR 32 & Union Street was deemed non-essential.

A turn lane warrant analysis has been completed for the right turns at the unsignalized intersections for the build scenarios. The turn lane warrant analysis is based on the guidelines presented in the *Indiana Design Manual*. A summary of the turn lane warrant analysis is provided in **Table 5.1**. A detailed breakdown of the turn lane warrant analysis is provided in **Appendix D**.

**Table 5.1 – Right-Turn Lane Warrant Analysis**

Intersection	Alternative A		Alternative B		Alternative C	
	EB	WB	EB	WB	EB	WB
SR 32 & Mill Street	<b>Met</b>	Not Met	<b>Met</b>	N/A	N/A	Not Met
SR 32 & Walnut Street	Not Met	Not Met	Not Met	N/A	N/A	Not Met
SR 32 & Cherry Street	Not Met	Not Met	Not Met	N/A	N/A	Not Met
SR 32 & East Street	--		N/A	<b>Met</b>	--	
Jersey Street & Cherry Street	--		--		Not Met	N/A

N/A – turn lane does not exist due to 1-way pair

“blank” – turn lane warrant was not analyzed (minor intersection)

## 6.0 Capacity Analysis

A capacity analysis has been performed for all study intersections for each scenario. The capacity analysis for the signalized and unsignalized (stop control) intersections was performed using Synchro (Version 9.2), and the capacity analysis for the roundabout intersections was performed using SIDRA (Version 8). All analyses were reported using the methodology outlined in the *Highway Capacity Manual* (HCM).

The standard parameter used to evaluate traffic operating conditions is referred to as the level-of-service (LOS). There are six LOS (A through F) which relate to driving conditions from best to worst, respectively. LOS for signalized and unsignalized (stop-control and roundabout) intersections is defined in terms of control delay per vehicle, which is a direct correlation to driver discomfort, frustration, fuel consumption, and lost travel time. **Table 6.1** provides the LOS criteria as defined in the *HCM*.

**Table 6.1 – LOS Thresholds**

LOS	Delay per Vehicle (seconds)	
	Signalized/Roundabout Intersections	Unsignalized Intersections
A	≤ 10	≤ 10
B	> 10 and ≤ 20	> 10 and ≤ 15
C	> 20 and ≤ 35	> 15 and ≤ 25
D	> 35 and ≤ 55	> 25 and ≤ 35
E	> 55 and ≤ 80	> 35 and ≤ 50
F	> 80	> 50

In general for the capacity analysis criteria, the operating conditions of intersections were considered to be acceptable if found to operate at LOS D or better for the overall intersection, with no approach operating worse than LOS E for the existing intersections and the new intersections created by the alternative alignments. Capacity improvements are identified for the locations not meeting the criteria. Improvements



were also recommended if the 95<sup>th</sup> percentile queue lengths were determined to have an adverse impact on corridor traffic operations.

Turn lane length recommendations were based on providing sufficient storage to accommodate 95<sup>th</sup> percentile queue lengths within the storage bay of the turn lane. Where practical, the recommended turn lane length accounts for the queue length of the adjacent through lane such that the through lane would not block entry into the turn lane.

The capacity analysis results are summarized for all scenarios in the tables on **pages 36-53** for the AM and PM peak hours, respectively. The capacity analysis output is provided in **Appendix E**.

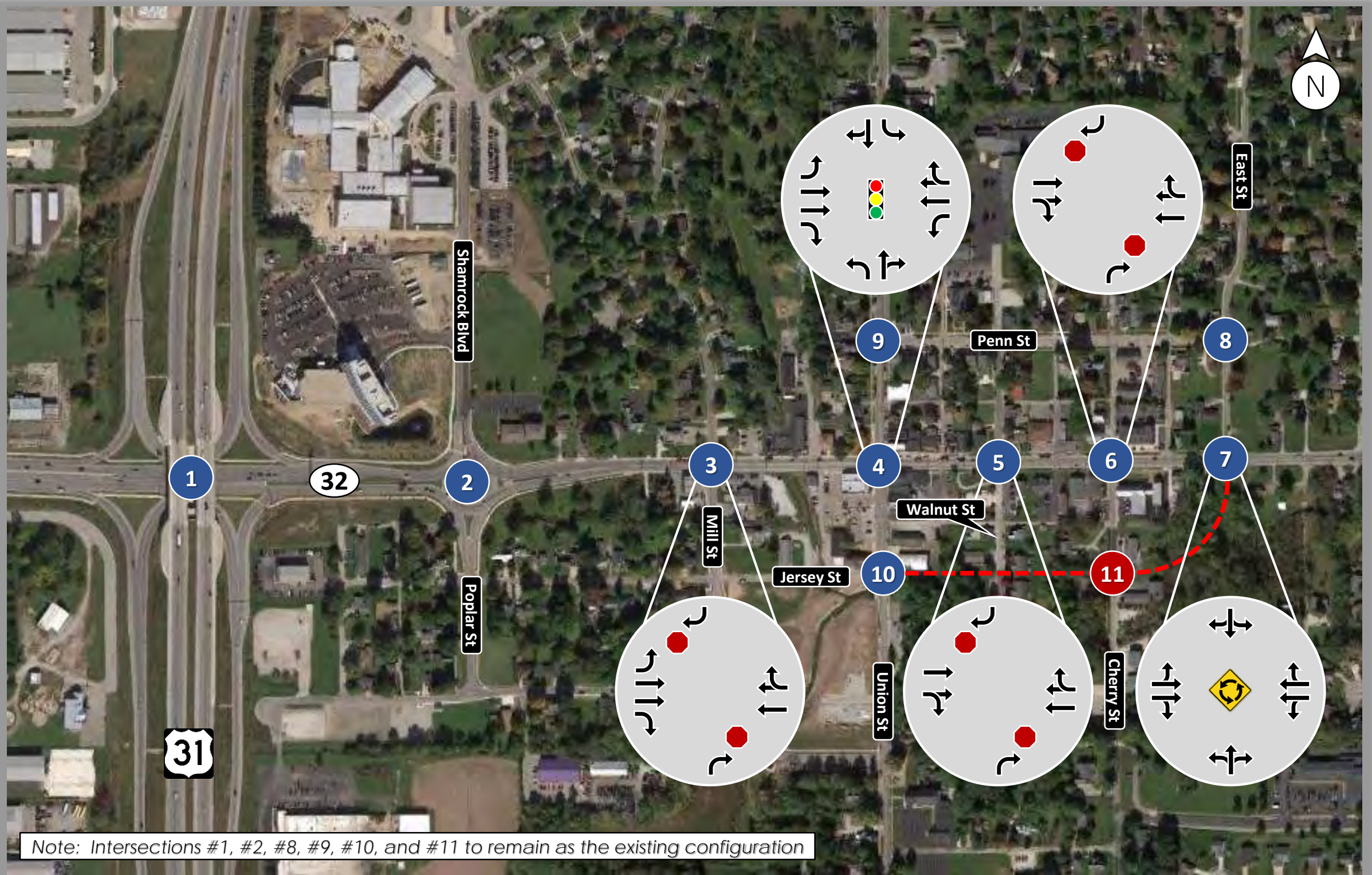
The study scenarios are listed as follows:

- Scenario 1 – Existing Year 2019
- Scenario 2 – Opening Year 2022 No-Build
- Scenario 3 – Opening Year 2022 Build
- Scenario 4 – Design Year 2042 No-Build
- Scenario 5 – Design Year 2042 Build

The alternative alignments are listed as follows:

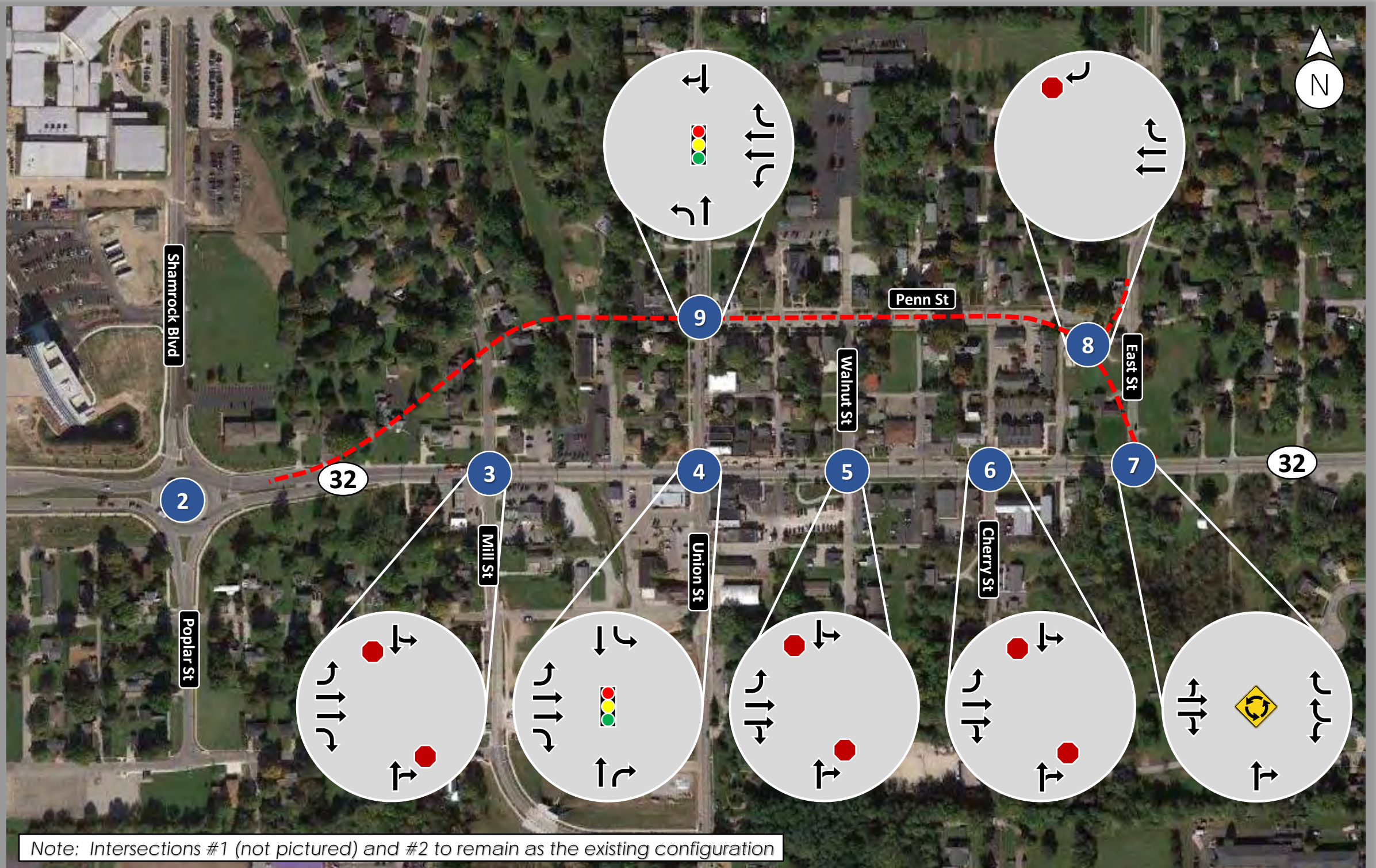
- Alternative A – SR 32 (4-lane) with access management
- Alternative B – One-Way pair with SR 32 eastbound (2-lane) and Penn Street westbound (2-lane)
- Alternative C – One-Way pair with SR 32 westbound (2-lane) and Jersey Street eastbound (2-lane)

The recommended lane configurations for Design Alternative A, B, and C are shown on **Figure 6.1** through **Figure 6.3**, respectively. Conceptual layouts for Design Alternative A, B, and C, are provided in **Appendix F**.

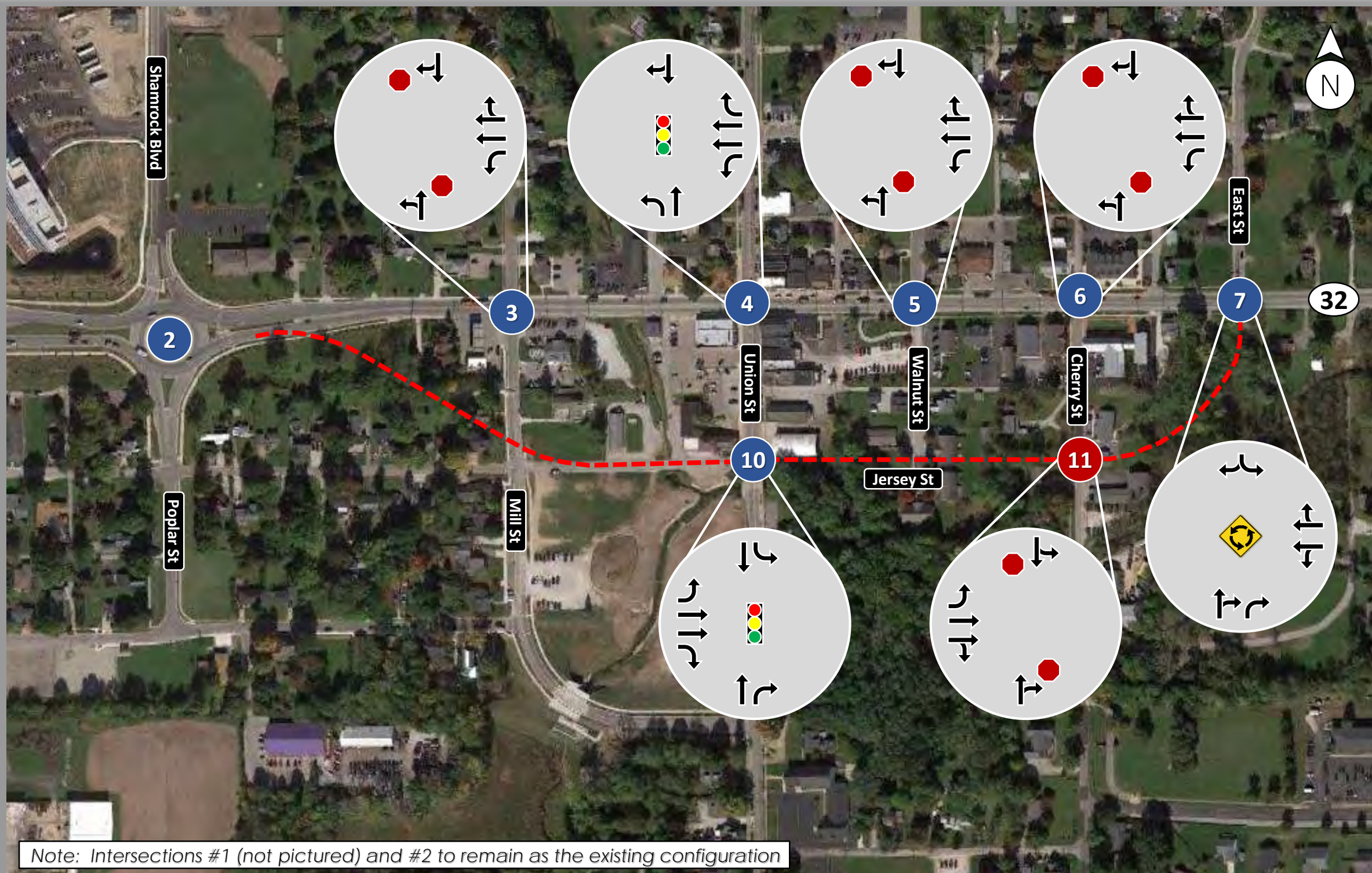


	<p><b>Legend</b></p> <ul style="list-style-type: none"> <li>1 Existing Intersection</li> <li>1 Future Intersection</li> </ul>	<ul style="list-style-type: none"> <li>Traffic Signal</li> <li>Stop Control</li> </ul>	<ul style="list-style-type: none"> <li>Roundabout</li> <li>Jersey St Extension</li> </ul>	<p>SR 32 Reconstruction Westfield, IN</p>	<p><b>Figure 6.1</b> Recommended Lane Config. (Alternative A)</p>
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## 6.1 SR 32 & US 31 Interchange

The capacity analysis for all scenarios has shown that the SR 32 & US 31 interchange is expected to operate at an acceptable level of service during the peak hours. No improvements are required.

## 6.2 SR 32 & Poplar Street / Shamrock Boulevard

The capacity analysis for all scenarios has shown that the intersection of SR 32 & Poplar Street / Shamrock Boulevard is expected to operate at an acceptable level of service during the peak hours as a multi-lane roundabout. No improvements are required.

An extension of Poplar Street south to 161<sup>st</sup> Street is anticipated to be constructed in the future and will likely be accompanied by development south of the study area. The SR 32 & Poplar Street / Shamrock Boulevard roundabout was built to allow for added capacity on the northbound and southbound approaches by restriping the pavement markings. The potential need for capacity improvements at the roundabout should be studied further if/when the development south of SR 32 materializes.

## 6.3 SR 32 & Mill Street / Westlea Drive

### 6.3.1 Design Year 2042 No-Build (Scenario 4)

The capacity analysis for Design Year 2042 No-Build (Scenario 4) has shown that the northbound and southbound approaches at the intersection of SR 32 & Mill Street / Westlea Drive are expected to operate at LOS F during the 2042 AM peak hour.

### 6.3.2 Design Year 2042 Build (Scenario 5)

With the widening of SR 32 to a four-lane roadway, the capacity analysis has shown that the intersection is expected to operate at an acceptable level of service for Design Year 2042 Build (Scenario 5) with the following geometric recommendations:

- Design Alternative A
  - Dedicated eastbound right-turn lane
  - Dedicated eastbound left-turn lane (restrict left turns for all other movements)
- Design Alternative B
  - Dedicated eastbound right-turn lane
  - Dedicated eastbound left-turn pocket lane
- Design Alternative C
  - Dedicated westbound left-turn pocket lane

## 6.4 SR 32 & Union Street

### 6.4.1 Existing Year 2019 (Scenario 1)

The capacity analysis for Existing Year 2019 (Scenario 1) has shown that the intersection of SR 32 & Union Street is expected to operate at an acceptable level of service during the AM and PM peak hours; however,

the 95<sup>th</sup> percentile queue lengths for the westbound approach (AM) and the eastbound approach (PM) exceed 900 feet during the respective peak hours.

#### **6.4.2 Design Year 2042 No-Build (Scenario 4)**

The capacity analysis for Design Year 2042 No-Build (Scenario 4) has shown that the intersection is expected to have multiple approaches that operate at LOS F during the AM and PM peak hours.

#### **6.4.3 Design Year 2042 Build (Scenario 5)**

With the widening of SR 32 to a four-lane roadway, the capacity analysis has shown that the intersection is expected to operate at an acceptable level of service for Design Year 2042 Build (Scenario 5) with the following geometric recommendations:

- Design Alternative A
  - Dedicated left-turn lanes on all approaches
  - Dedicated right-turn lane on the eastbound approach
- Design Alternative B
  - Dedicated northbound right-turn lane
  - Dedicated southbound left-turn lane
  - Dedicated eastbound left-turn lane
  - Dedicated eastbound right-turn lane
- Design Alternative C
  - Dedicated northbound left-turn lane
  - Dedicated westbound left-turn lane
  - Dedicated westbound right-turn lane

### **6.5 SR 32 & Walnut Street**

#### **6.5.1 Design Year 2042 No-Build (Scenario 4)**

The capacity analysis for Design Year 2042 No-Build (Scenario 4) has shown that the southbound approach at the intersection of SR 32 & Walnut Street is expected to operate at LOS F during the 2042 PM peak hour.

#### **6.5.2 Design Year 2042 Build (Scenario 5)**

With the widening of SR 32 to a four-lane roadway, the capacity analysis has shown that the intersection is expected to operate at an acceptable level of service for Design Year 2042 Build (Scenario 5) with the following geometric recommendations:

- Design Alternative A
  - Restrict left turns for all movements
- Design Alternative B
  - Dedicated eastbound left-turn pocket lane
- Design Alternative C
  - Dedicated westbound left-turn pocket lane



## 6.6 SR 32 & Cherry Street

The capacity analysis for all scenarios has shown that the intersection of SR 32 & Cherry Street is expected to operate at an acceptable level of service during the peak hours.

### 6.6.1 Design Year 2042 Build (Scenario 5)

With the widening of SR 32 to a four-lane roadway, the capacity analysis has shown that the intersection is expected to operate at an acceptable level of service for Design Year 2042 Build (Scenario 5) with the following geometric recommendations:

- Design Alternative A
  - Restrict left turns for all movements
- Design Alternative B
  - Dedicated eastbound left-turn pocket lane
- Design Alternative C
  - Dedicated westbound left-turn pocket lane

## 6.7 SR 32 & East Street

### 6.7.1 Design Year 2042 No-Build (Scenario 4)

The capacity analysis for Design Year 2042 No-Build (Scenario 4) has shown that the southbound approach at the intersection of SR 32 & East Street is expected to operate at LOS F during the 2042 AM and PM peak hours.

### 6.7.2 Design Year 2042 Build (Scenario 5)

With the widening of SR 32 to a four-lane roadway, the capacity analysis has shown that the intersection is expected to operate at an acceptable level of service for Design Year 2042 Build (Scenario 5). Due to the access management recommendations for Alternative A and the desired transitions to one-way pairs for Alternative B and Alternative C, the intersection of SR 32 & East Street is recommended to be a multi-lane roundabout with the following geometric recommendations:

- Design Alternative A
  - Two (2) shared lanes on the eastbound and westbound approaches
  - A single, shared lane on the northbound and southbound approaches
- Design Alternative B
  - Two (2) shared lanes on the eastbound approach
  - Shared left/right-turn lane and dedicated right-turn lane on the westbound approach
  - Single, shared lane on the northbound approach
- Design Alternative C
  - Two (2) shared lanes on the westbound approach
  - Shared through/right-turn lane and dedicated right-turn lane on the northbound approach
  - Single, shared lane on the southbound approach

## 6.8 Penn Street & East Street

The capacity analysis for all scenarios has shown that the intersection of Penn Street & East Street is expected to operate at an acceptable level of service during the peak hours.

### 6.8.1 Design Year 2042 Build (Scenario 5)

With the widening of SR 32 to a four-lane roadway, the capacity analysis has shown that the intersection is expected to operate at an acceptable level of service for Design Year 2042 Build (Scenario 5) with the following geometric recommendations:

- Design Alternative A
  - The alignment does not impact the intersection
- Design Alternative B
  - Dedicated westbound right-turn lane
- Design Alternative C
  - The alignment does not impact the intersection

## 6.9 Penn Street & Union Street

The capacity analysis for all scenarios has shown that the intersection of Penn Street & Union Street is expected to operate at an acceptable level of service during the peak hours.

### 6.9.1 Design Year 2042 Build (Scenario 5)

With the widening of SR 32 to a four-lane roadway, the capacity analysis has shown that the intersection is expected to operate at an acceptable level of service for Design Year 2042 Build (Scenario 5) with the following geometric recommendations:

- Design Alternative A
  - The alignment does not impact the intersection
- Design Alternative B
  - Install traffic signal
  - Dedicated northbound left-turn lane
  - Dedicated westbound left-turn
  - Dedicated westbound right-turn lane
- Design Alternative C
  - The alignment does not impact the intersection

## 6.10 Jersey Street & Union Street

The capacity analysis for all scenarios has shown that the intersection of Jersey Street & Union Street is expected to operate at an acceptable level of service during the peak hours.



#### 6.10.1 Design Year 2042 Build (Scenario 5)

With the widening of SR 32 to a four-lane roadway, the capacity analysis has shown that the intersection is expected to operate at an acceptable level of service for Design Year 2042 Build (Scenario 5) with the following geometric recommendations:

- Design Alternative A
  - The alignment does not impact the intersection
- Design Alternative B
  - The alignment does not impact the intersection
- Design Alternative C
  - Install traffic signal
  - Dedicated northbound right-turn lane
  - Dedicated southbound left-turn lane
  - Dedicated eastbound left-turn lane
  - Dedicated eastbound right-turn lane

### 6.11 Jersey Street & Cherry Street

The capacity analysis for all scenarios has shown that the intersection of Jersey Street & Cherry Street is expected to operate at an acceptable level of service during the peak hours.

#### 6.11.1 Design Year 2042 Build (Scenario 5)

With the widening of SR 32 to a four-lane roadway, the capacity analysis has shown that the intersection is expected to operate at an acceptable level of service for Design Year 2042 Build (Scenario 5) with the following geometric recommendations:

- Design Alternative A
  - The alignment does not impact the intersection
- Design Alternative B
  - The alignment does not impact the intersection
- Design Alternative C
  - Dedicated eastbound left-turn pocket lane

**Table 6.2 – Capacity Analysis Results for Scenario 1: Existing Year (2019 AM)**

No.	Intersection	Control Type	Parameter	Approach				
				NB	SB	EB	WB	Ovr
1	SR 32 & US 31	Signal	LOS	C	B	C	C	C
			Delay (sec/veh)	25.0	10.3	22.5	30.3	24.3
			95 <sup>th</sup> % Queue Length (ft)	125	50	200	225	--
2	SR 32 & Poplar St/Shamrock Blvd	RAB	LOS	B	A	A	A	A
			Delay (sec/veh)	10.4	8.7	6.9	7.7	7.6
			95 <sup>th</sup> % Queue Length (ft)	25	75	100	125	--
3	SR 32 & Mill St/Westlea Dr	TWSC	LOS	E	D	A	A	A
			Delay (sec/veh)	39.4	29.5	0.1	0.1	0.9
			95 <sup>th</sup> % Queue Length (ft)	25	25	0	0	--
4	SR 32 & Union St	Signal	LOS	E	E	B	D	D
			Delay (sec/veh)	62.6	72.6	19.8	50.6	44.0
			95 <sup>th</sup> % Queue Length (ft)	225	275	475	975	--
5	SR 32 & Walnut St	TWSC	LOS	C	C	A	A	A
			Delay (sec/veh)	24.3	16.2	0.0	0.0	0.2
			95 <sup>th</sup> % Queue Length (ft)	25	25	0	0	--
6	SR 32 & Cherry St	TWSC	LOS	C	C	A	A	A
			Delay (sec/veh)	21.2	16.8	0.1	0.3	0.8
			95 <sup>th</sup> % Queue Length (ft)	25	25	0	0	--
7	SR 32 & East St	OWSC	LOS		D	A	A	A
			Delay (sec/veh)		32.5	0.9	0.0	1.8
			95 <sup>th</sup> % Queue Length (ft)		50	0	0	--
8	Penn St & East St	OWSC	LOS	A	A	B		A
			Delay (sec/veh)	0.5	0.0	11.0		1.2
			95 <sup>th</sup> % Queue Length (ft)	0	0	25		--
9	Penn St & Union St	TWSC	LOS	A	A	A	B	A
			Delay (sec/veh)	0.0	0.3	0.0	13.0	1.4
			95 <sup>th</sup> % Queue Length (ft)	0	0	0	25	--
10	Jersey St & Union St	OWSC	LOS	A	A	B		A
			Delay (sec/veh)	0.3	0.0	10.5		0.6
			95 <sup>th</sup> % Queue Length (ft)	0	0	25		--
11	Jersey St (future) & Cherry St	N/A	LOS					
			Delay (sec/veh)					
			95 <sup>th</sup> % Queue Length (ft)					

RAB = Roundabout, TWSC = Two-Way Stop Control, OWSC = One-Way Stop Control

XXX indicates the MOE does not meet the criteria thresholds



**Table 6.3 – Capacity Analysis Results for Scenario 1: Existing Year (2019 PM)**

No.	Intersection	Control Type	Parameter	Approach				
				NB	SB	EB	WB	Ovr
1	SR 32 & US 31	Signal	LOS	C	B	C	D	C
			Delay (sec/veh)	22.1	13.6	25.6	37.0	26.2
			95 <sup>th</sup> % Queue Length (ft)	200	50	250	200	--
2	SR 32 & Poplar St/Shamrock Blvd	RAB	LOS	B	A	A	A	A
			Delay (sec/veh)	11.1	7.0	4.2	4.1	4.6
			95 <sup>th</sup> % Queue Length (ft)	25	25	75	25	--
3	SR 32 & Mill St/Westlea Dr	TWSC	LOS	D	C	A	A	A
			Delay (sec/veh)	26.6	24.8	0.1	0.3	0.9
			95 <sup>th</sup> % Queue Length (ft)	25	25	0	0	--
4	SR 32 & Union St	Signal	LOS	E	D	C	C	C
			Delay (sec/veh)	66.8	51.0	27.6	22.7	34.2
			95 <sup>th</sup> % Queue Length (ft)	300	200	900	550	--
5	SR 32 & Walnut St	TWSC	LOS	C	D	A	A	A
			Delay (sec/veh)	19.2	34.3	0.0	0.1	0.4
			95 <sup>th</sup> % Queue Length (ft)	25	25	0	0	--
6	SR 32 & Cherry St	TWSC	LOS	D	C	A	A	A
			Delay (sec/veh)	26.5	17.9	0.0	0.3	0.6
			95 <sup>th</sup> % Queue Length (ft)	25	25	0	0	--
7	SR 32 & East St	OWSC	LOS		E	A	A	A
			Delay (sec/veh)		40.2	0.2	0.0	1.0
			95 <sup>th</sup> % Queue Length (ft)		25	0	0	--
8	Penn St & East St	OWSC	LOS	A	A	A		A
			Delay (sec/veh)	0.5	0.0	9.4		1.6
			95 <sup>th</sup> % Queue Length (ft)	0	0	25		--
9	Penn St & Union St	TWSC	LOS	A	A	A	B	A
			Delay (sec/veh)	0.0	0.2	0.0	12.2	0.9
			95 <sup>th</sup> % Queue Length (ft)	0	0	0	25	--
10	Jersey St & Union St	OWSC	LOS	A	A	B		A
			Delay (sec/veh)	0.3	0.0	11.7		1.0
			95 <sup>th</sup> % Queue Length (ft)	0	0	25		--
11	Jersey St (future) & Cherry St	N/A	LOS					
			Delay (sec/veh)					
			95 <sup>th</sup> % Queue Length (ft)					

RAB = Roundabout, TWSC = Two-Way Stop Control, OWSC = One-Way Stop Control

XXX indicates the MOE does not meet the criteria thresholds

**Table 6.4 – Capacity Analysis Results for Scenario 2: Opening Year No-Build (2022 AM)**

No.	Intersection	Control Type	Parameter	Approach				
				NB	SB	EB	WB	Ovr
1	SR 32 & US 31	Signal	LOS	C	A	C	C	<b>C</b>
			Delay (sec/veh)	30.0	8.8	24.3	32.0	<b>26.3</b>
			95 <sup>th</sup> % Queue Length (ft)	275	50	250	225	--
2	SR 32 & Poplar St/Shamrock Blvd	RAB	LOS	B	A	A	A	<b>A</b>
			Delay (sec/veh)	10.8	9.6	7.0	9.4	<b>8.5</b>
			95 <sup>th</sup> % Queue Length (ft)	25	100	100	175	--
3	SR 32 & Mill St/Westlea Dr	TWSC	LOS	<b>F</b>	E	A	A	<b>A</b>
			Delay (sec/veh)	<b>52.5</b>	35.6	0.1	0.1	<b>1.1</b>
			95 <sup>th</sup> % Queue Length (ft)	<b>25</b>	25	0	0	--
4	SR 32 & Union St	Signal	LOS	E	E	C	<b>F</b>	<b>E</b>
			Delay (sec/veh)	61.7	75.8	24.5	<b>81.0</b>	<b>59.0</b>
			95 <sup>th</sup> % Queue Length (ft)	225	300	500	<b>1,100</b>	--
5	SR 32 & Walnut St	TWSC	LOS	D	C	A	A	<b>A</b>
			Delay (sec/veh)	28.0	17.5	0.0	0.0	<b>0.2</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0	0	--
6	SR 32 & Cherry St	TWSC	LOS	C	C	A	A	<b>A</b>
			Delay (sec/veh)	24.1	18.3	0.1	0.3	<b>0.8</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0	0	--
7	SR 32 & East St	OWSC	LOS		E	A	A	<b>A</b>
			Delay (sec/veh)		42.2	0.9	0.0	<b>2.2</b>
			95 <sup>th</sup> % Queue Length (ft)		50	0	0	--
8	Penn St & East St	OWSC	LOS	A	A	B		<b>A</b>
			Delay (sec/veh)	0.5	0.0	11.2		<b>1.2</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	25		--
9	Penn St & Union St	TWSC	LOS	A	A	A	B	<b>A</b>
			Delay (sec/veh)	0.0	0.3	0.0	13.4	<b>1.4</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	0	25	--
10	Jersey St & Union St	OWSC	LOS	A	A	B		<b>A</b>
			Delay (sec/veh)	0.3	0.0	10.6		<b>0.6</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	25		--
11	Jersey St (future) & Cherry St	N/A	LOS					
			Delay (sec/veh)					
			95 <sup>th</sup> % Queue Length (ft)					

RAB = Roundabout, TWSC = Two-Way Stop Control, OWSC = One-Way Stop Control

XXX indicates the MOE does not meet the criteria thresholds



**Table 6.5 – Capacity Analysis Results for Scenario 2: Opening Year No-Build (2022 PM)**

No.	Intersection	Control Type	Parameter	Approach				
				NB	SB	EB	WB	Ovr
1	SR 32 & US 31	Signal	LOS	C	A	C	D	<b>C</b>
			Delay (sec/veh)	27.5	7.0	22.2	36.0	<b>25.2</b>
			95 <sup>th</sup> % Queue Length (ft)	400	50	225	225	--
2	SR 32 & Poplar St/Shamrock Blvd	RAB	LOS	B	A	A	A	<b>A</b>
			Delay (sec/veh)	11.6	7.2	4.3	4.2	<b>4.7</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	75	50	--
3	SR 32 & Mill St/Westlea Dr	TWSC	LOS	E	D	A	A	<b>A</b>
			Delay (sec/veh)	40.8	32.6	0.1	0.3	<b>1.2</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0	0	--
4	SR 32 & Union St	Signal	LOS	E	D	C	C	<b>D</b>
			Delay (sec/veh)	74.1	54.9	32.8	26.1	<b>38.5</b>
			95 <sup>th</sup> % Queue Length (ft)	375	250	1,100	625	--
5	SR 32 & Walnut St	TWSC	LOS	C	E	A	A	<b>A</b>
			Delay (sec/veh)	22.3	45.6	0.0	0.1	<b>0.5</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0	0	--
6	SR 32 & Cherry St	TWSC	LOS	D	C	A	A	<b>A</b>
			Delay (sec/veh)	34.2	21.8	0.0	0.3	<b>0.7</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0	0	--
7	SR 32 & East St	OWSC	LOS		<b>F</b>	A	A	<b>A</b>
			Delay (sec/veh)		63.4	0.2	0.0	<b>1.6</b>
			95 <sup>th</sup> % Queue Length (ft)		50	0	0	--
8	Penn St & East St	OWSC	LOS	A	A	A		<b>A</b>
			Delay (sec/veh)	0.5	0.0	9.5		<b>1.5</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	25		--
9	Penn St & Union St	TWSC	LOS	A	A	A	B	<b>A</b>
			Delay (sec/veh)	0.0	0.1	0.0	12.6	<b>0.9</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	0	25	--
10	Jersey St & Union St	OWSC	LOS	A	A	B		<b>A</b>
			Delay (sec/veh)	0.3	0.0	11.9		<b>1.0</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	25		--
11	Jersey St (future) & Cherry St	N/A	LOS					
			Delay (sec/veh)					
			95 <sup>th</sup> % Queue Length (ft)					

RAB = Roundabout, TWSC = Two-Way Stop Control, OWSC = One-Way Stop Control

XXX indicates the MOE does not meet the criteria thresholds

**Table 6.6 – Capacity Analysis Results for Scenario 3A: Opening Year Build (2022 AM)**

No.	Intersection	Control Type	Parameter	Approach				
				NB	SB	EB	WB	Ovr
1	SR 32 & US 31	Signal	LOS	D	B	C	D	<b>C</b>
			Delay (sec/veh)	38.1	10.0	26.6	37.3	<b>31.0</b>
			95 <sup>th</sup> % Queue Length (ft)	375	75	325	300	--
2	SR 32 & Poplar St/Shamrock Blvd	RAB	LOS	B	B	A	B	<b>A</b>
			Delay (sec/veh)	12.2	10.1	7.0	11.8	<b>9.6</b>
			95 <sup>th</sup> % Queue Length (ft)	25	100	125	200	--
3	SR 32 & Mill St/Westlea Dr	TWSC	LOS	B	B	A	A	<b>A</b>
			Delay (sec/veh)	11.5	13.7	0.1	0.0	<b>0.3</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0	0	--
4	SR 32 & Union St	Signal	LOS	D	D	B	B	<b>C</b>
			Delay (sec/veh)	40.9	43.8	16.0	19.2	<b>23.4</b>
			95 <sup>th</sup> % Queue Length (ft)	175	200	200	300	--
5	SR 32 & Walnut St	TWSC	LOS	B	B	A	A	<b>A</b>
			Delay (sec/veh)	12.4	12.1	0.0	0.0	<b>0.1</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0	0	--
6	SR 32 & Cherry St	TWSC	LOS	B	B	A	A	<b>A</b>
			Delay (sec/veh)	12.0	12.8	0.0	0.0	<b>0.3</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0	0	--
7	SR 32 & East St	RAB	LOS	A	A	A	A	<b>A</b>
			Delay (sec/veh)	6.7	7.1	4.1	3.9	<b>4.1</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	25	50	--
8	Penn St & East St	OWSC	LOS	A	A	B		<b>A</b>
			Delay (sec/veh)	0.6	0.0	11.4		<b>1.2</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	25		--
9	Penn St & Union St	TWSC	LOS	A	A	A	B	<b>A</b>
			Delay (sec/veh)	0.0	0.3	0.0	13.5	<b>1.4</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	0	25	--
10	Jersey St & Union St	TWSC	LOS	A	A	B	B	<b>A</b>
			Delay (sec/veh)	0.3	0.0	10.7	11.5	<b>0.6</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	25	25	--
11	Jersey St (future) & Cherry St	TWSC	LOS	A	A	A	A	<b>A</b>
			Delay (sec/veh)	9.2	9.2	0.0	0.0	<b>8.1</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0	0	--

RAB = Roundabout, TWSC = Two-Way Stop Control, OWSC = One-Way Stop Control

XXX indicates the MOE does not meet the criteria thresholds



**Table 6.7 – Capacity Analysis Results for Scenario 3A: Opening Year Build (2022 PM)**

No.	Intersection	Control Type	Parameter	Approach				
				NB	SB	EB	WB	Ovr
1	SR 32 & US 31	Signal	LOS	C	B	C	D	<b>C</b>
			Delay (sec/veh)	31.1	11.7	28.9	48.7	<b>32.3</b>
			95 <sup>th</sup> % Queue Length (ft)	500	75	350	325	--
2	SR 32 & Poplar St/Shamrock Blvd	RAB	LOS	B	A	A	A	<b>A</b>
			Delay (sec/veh)	12.5	7.6	4.4	4.8	<b>5.2</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	100	50	--
3	SR 32 & Mill St/Westlea Dr	TWSC	LOS	B	B	A	A	<b>A</b>
			Delay (sec/veh)	12.7	11.6	0.1	0.0	<b>0.3</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0	0	--
4	SR 32 & Union St	Signal	LOS	D	C	C	B	<b>C</b>
			Delay (sec/veh)	37.3	31.4	22.2	19.5	<b>24.9</b>
			95 <sup>th</sup> % Queue Length (ft)	275	150	300	200	--
5	SR 32 & Walnut St	TWSC	LOS	B	B	A	A	<b>A</b>
			Delay (sec/veh)	13.4	11.1	0.0	0.0	<b>0.2</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0	0	--
6	SR 32 & Cherry St	TWSC	LOS	B	B	A	A	<b>A</b>
			Delay (sec/veh)	14.4	11.2	0.0	0.0	<b>0.4</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0	0	--
7	SR 32 & East St	RAB	LOS	A	A	A	A	<b>A</b>
			Delay (sec/veh)	7.8	8.0	3.8	3.7	<b>3.9</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	75	50	--
8	Penn St & East St	OWSC	LOS	A	A	A		<b>A</b>
			Delay (sec/veh)	0.7	0.0	9.6		<b>1.6</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	25		--
9	Penn St & Union St	TWSC	LOS	A	A	A	B	<b>A</b>
			Delay (sec/veh)	0.0	0.1	0.0	12.8	<b>0.9</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	0	25	--
10	Jersey St & Union St	TWSC	LOS	A	A	B	B	<b>A</b>
			Delay (sec/veh)	0.3	0.0	12.1	10.9	<b>1.1</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	25	25	--
11	Jersey St (future) & Cherry St	TWSC	LOS	A	A	A	A	<b>A</b>
			Delay (sec/veh)	9.2	9.2	0.0	0.0	<b>7.8</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0	0	--

RAB = Roundabout, TWSC = Two-Way Stop Control, OWSC = One-Way Stop Control

XXX indicates the MOE does not meet the criteria thresholds

**Table 6.8 – Capacity Analysis Results for Scenario 3B: Opening Year Build (2022 AM)**

No.	Intersection	Control Type	Parameter	Approach				
				NB	SB	EB	WB	Ovr
1	SR 32 & US 31	Signal	LOS	D	B	C	D	<b>C</b>
			Delay (sec/veh)	38.1	10.0	26.6	37.3	<b>31.0</b>
			95 <sup>th</sup> % Queue Length (ft)	375	75	325	300	--
2	SR 32 & Poplar St/Shamrock Blvd	RAB	LOS	B	B	A	B	<b>A</b>
			Delay (sec/veh)	12.2	10.1	6.9	11.7	<b>9.5</b>
			95 <sup>th</sup> % Queue Length (ft)	25	100	125	200	--
3	SR 32 & Mill St/Westlea Dr	TWSC	LOS	B	C	A		<b>A</b>
			Delay (sec/veh)	13.1	19.5	0.0		<b>0.6</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0		--
4	SR 32 & Union St	Signal	LOS	C	B	B		<b>B</b>
			Delay (sec/veh)	29.3	17.1	10.2		<b>14.9</b>
			95 <sup>th</sup> % Queue Length (ft)	125	75	150		--
5	SR 32 & Walnut St	TWSC	LOS	B	C	A		<b>A</b>
			Delay (sec/veh)	12.4	17.0	0.0		<b>0.3</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0		--
6	SR 32 & Cherry St	TWSC	LOS	B	C	A		<b>A</b>
			Delay (sec/veh)	12.0	16.5	0.0		<b>1.4</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0		--
7	SR 32 & East St	RAB	LOS	A		A	A	<b>A</b>
			Delay (sec/veh)	5.1		4.1	4.2	<b>4.2</b>
			95 <sup>th</sup> % Queue Length (ft)	25		25	50	--
8	Penn St & East St	OWSC	LOS		C		A	<b>A</b>
			Delay (sec/veh)		17.2		0.0	<b>1.8</b>
			95 <sup>th</sup> % Queue Length (ft)		50		0	--
9	Penn St & Union St	Signal	LOS	A	B		B	<b>B</b>
			Delay (sec/veh)	8.9	16.1		19.8	<b>17.0</b>
			95 <sup>th</sup> % Queue Length (ft)	125	200		200	--
10	Jersey St & Union St	TWSC	LOS	A	A	B	A	<b>A</b>
			Delay (sec/veh)	0.3	0.0	10.9	9.6	<b>1.0</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	25	25	--
11	Jersey St (future) & Cherry St	TWSC	LOS	A	A	A	A	<b>A</b>
			Delay (sec/veh)	0.2	0.0	8.5	9.3	<b>2.5</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	25	25	--

RAB = Roundabout, TWSC = Two-Way Stop Control, OWSC = One-Way Stop Control

XXX indicates the MOE does not meet the criteria thresholds



**Table 6.9 – Capacity Analysis Results for Scenario 3B: Opening Year Build (2022 PM)**

No.	Intersection	Control Type	Parameter	Approach				
				NB	SB	EB	WB	Ovr
1	SR 32 & US 31	Signal	LOS	C	B	C	D	<b>C</b>
			Delay (sec/veh)	31.1	11.7	28.9	48.7	<b>32.3</b>
			95 <sup>th</sup> % Queue Length (ft)	500	75	350	325	--
2	SR 32 & Poplar St/Shamrock Blvd	RAB	LOS	B	A	A	A	<b>A</b>
			Delay (sec/veh)	12.6	7.7	4.3	5.0	<b>5.4</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	100	50	--
3	SR 32 & Mill St/Westlea Dr	TWSC	LOS	B	D	A		<b>A</b>
			Delay (sec/veh)	14.8	26.6	0.0		<b>0.9</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0		--
4	SR 32 & Union St	Signal	LOS	C	B	B		<b>B</b>
			Delay (sec/veh)	29.7	18.9	12.0		<b>17.0</b>
			95 <sup>th</sup> % Queue Length (ft)	150	125	225		--
5	SR 32 & Walnut St	TWSC	LOS	B	C	A		<b>A</b>
			Delay (sec/veh)	13.7	22.6	0.0		<b>0.5</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0		--
6	SR 32 & Cherry St	TWSC	LOS	C	C	A		<b>A</b>
			Delay (sec/veh)	15.4	23.9	0.0		<b>1.3</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0		--
7	SR 32 & East St	RAB	LOS	A		A	A	<b>A</b>
			Delay (sec/veh)	6.3		3.8	4.3	<b>4.0</b>
			95 <sup>th</sup> % Queue Length (ft)	25		75	50	--
8	Penn St & East St	OWSC	LOS		A		B	<b>A</b>
			Delay (sec/veh)		0.0		11.7	<b>0.9</b>
			95 <sup>th</sup> % Queue Length (ft)		0		25	--
9	Penn St & Union St	Signal	LOS	A	A		C	<b>B</b>
			Delay (sec/veh)	5.0	8.6		23.6	<b>15.7</b>
			95 <sup>th</sup> % Queue Length (ft)	150	125		150	--
10	Jersey St & Union St	TWSC	LOS	A	A	B	B	<b>A</b>
			Delay (sec/veh)	0.3	0.0	12.8	10.3	<b>1.6</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	25	25	--
11	Jersey St (future) & Cherry St	TWSC	LOS	A	A	A	A	<b>A</b>
			Delay (sec/veh)	0.3	0.4	8.5	9.5	<b>4.6</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	25	25	--

RAB = Roundabout, TWSC = Two-Way Stop Control, OWSC = One-Way Stop Control

XXX indicates the MOE does not meet the criteria thresholds

**Table 6.10 – Capacity Analysis Results for Scenario 3C: Opening Year Build (2022 AM)**

No.	Intersection	Control Type	Parameter	Approach				
				NB	SB	EB	WB	Ovr
1	SR 32 & US 31	Signal	LOS	D	B	C	D	<b>C</b>
			Delay (sec/veh)	38.1	10.0	26.6	37.3	<b>31.0</b>
			95 <sup>th</sup> % Queue Length (ft)	375	75	325	300	--
2	SR 32 & Poplar St/Shamrock Blvd	RAB	LOS	B	B	A	B	<b>A</b>
			Delay (sec/veh)	11.1	10.5	6.9	10.5	<b>9.0</b>
			95 <sup>th</sup> % Queue Length (ft)	25	100	125	200	--
3	SR 32 & Mill St/Westlea Dr	TWSC	LOS	C	C		A	<b>A</b>
			Delay (sec/veh)	19.5	15.6		0.0	<b>1.4</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25		0	--
4	SR 32 & Union St	Signal	LOS	B	D		B	<b>B</b>
			Delay (sec/veh)	16.4	35.9		14.8	<b>19.0</b>
			95 <sup>th</sup> % Queue Length (ft)	125	175		225	--
5	SR 32 & Walnut St	TWSC	LOS	B	B		A	<b>A</b>
			Delay (sec/veh)	13.6	12.1		0.0	<b>0.1</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25		0	--
6	SR 32 & Cherry St	TWSC	LOS	C	B		A	<b>A</b>
			Delay (sec/veh)	20.1	12.3		0.0	<b>0.3</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25		0	--
7	SR 32 & East St	RAB	LOS	A	A		A	<b>A</b>
			Delay (sec/veh)	3.6	7.1		3.6	<b>3.7</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25		50	--
8	Penn St & East St	OWSC	LOS	A	A	B		<b>A</b>
			Delay (sec/veh)	0.5	0.0	11.2		<b>1.2</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	25		--
9	Penn St & Union St	TWSC	LOS	A	A	A	B	<b>A</b>
			Delay (sec/veh)	0.0	0.2	0.0	13.4	<b>1.4</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	0	25	--
10	Jersey St & Union St	Signal	LOS	B	A	C		<b>B</b>
			Delay (sec/veh)	16.3	1.8	20.8		<b>17.1</b>
			95 <sup>th</sup> % Queue Length (ft)	125	25	150		--
11	Jersey St (future) & Cherry St	TWSC	LOS	B	C	A		<b>A</b>
			Delay (sec/veh)	12.2	17.7	0.0		<b>1.2</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0		--

RAB = Roundabout, TWSC = Two-Way Stop Control, OWSC = One-Way Stop Control

XXX indicates the MOE does not meet the criteria thresholds



**Table 6.11 – Capacity Analysis Results for Scenario 3C: Opening Year Build (2022 PM)**

No.	Intersection	Control Type	Parameter	Approach				
				NB	SB	EB	WB	Ovr
1	SR 32 & US 31	Signal	LOS	C	B	C	D	<b>C</b>
			Delay (sec/veh)	31.1	11.7	28.9	48.7	<b>32.3</b>
			95 <sup>th</sup> % Queue Length (ft)	500	75	350	325	--
2	SR 32 & Poplar St/Shamrock Blvd	RAB	LOS	B	A	A	A	<b>A</b>
			Delay (sec/veh)	11.9	7.5	4.3	4.3	<b>4.7</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	100	50	--
3	SR 32 & Mill St/Westlea Dr	TWSC	LOS	C	B		A	<b>A</b>
			Delay (sec/veh)	16.6	13.4		0.0	<b>1.7</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25		0	--
4	SR 32 & Union St	Signal	LOS	B	C		B	<b>B</b>
			Delay (sec/veh)	18.7	33.3		11.7	<b>17.9</b>
			95 <sup>th</sup> % Queue Length (ft)	125	175		125	--
5	SR 32 & Walnut St	TWSC	LOS	C	B		A	<b>A</b>
			Delay (sec/veh)	17.3	13.2		0.0	<b>0.2</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25		0	--
6	SR 32 & Cherry St	TWSC	LOS	B	B		A	<b>A</b>
			Delay (sec/veh)	14.4	11.6		0.0	<b>0.3</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25		0	--
7	SR 32 & East St	RAB	LOS	A	A		A	<b>A</b>
			Delay (sec/veh)	3.6	7.9		3.5	<b>3.7</b>
			95 <sup>th</sup> % Queue Length (ft)	75	25		50	--
8	Penn St & East St	OWSC	LOS	A	A	A		<b>A</b>
			Delay (sec/veh)	0.5	0.0	9.6		<b>1.5</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	25		--
9	Penn St & Union St	TWSC	LOS	A	A	A	B	<b>A</b>
			Delay (sec/veh)	0.0	0.1	0.0	12.6	<b>0.9</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	0	25	--
10	Jersey St & Union St	Signal	LOS	C	A	B		<b>B</b>
			Delay (sec/veh)	20.1	2.9	19.5		<b>17.1</b>
			95 <sup>th</sup> % Queue Length (ft)	175	25	225		--
11	Jersey St (future) & Cherry St	TWSC	LOS	C	D	A		<b>A</b>
			Delay (sec/veh)	15.5	25.6	0.0		<b>0.9</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0		--

RAB = Roundabout, TWSC = Two-Way Stop Control, OWSC = One-Way Stop Control

XXX indicates the MOE does not meet the criteria thresholds

**Table 6.12 – Capacity Analysis Results for Scenario 4: Design Year No-Build (2042 AM)**

No.	Intersection	Control Type	Parameter	Approach				
				NB	SB	EB	WB	Ovr
1	SR 32 & US 31	Signal	LOS	D	A	C	D	<b>C</b>
			Delay (sec/veh)	37.9	8.6	33.0	42.8	<b>34.5</b>
			95 <sup>th</sup> % Queue Length (ft)	350	50	325	325	--
2	SR 32 & Poplar St/Shamrock Blvd	RAB	LOS	B	B	A	B	<b>B</b>
			Delay (sec/veh)	11.2	12.1	7.1	13.3	<b>10.5</b>
			95 <sup>th</sup> % Queue Length (ft)	25	150	125	275	--
3	SR 32 & Mill St/Westlea Dr	TWSC	LOS	<b>F</b>	<b>F</b>	A	A	<b>A</b>
			Delay (sec/veh)	<b>159.3</b>	<b>62.1</b>	0.1	0.1	<b>2.4</b>
			95 <sup>th</sup> % Queue Length (ft)	<b>50</b>	<b>50</b>	0	0	--
4	SR 32 & Union St	Signal	LOS	<b>F</b>	<b>F</b>	D	<b>F</b>	<b>F</b>
			Delay (sec/veh)	<b>111.5</b>	<b>140.9</b>	39.9	<b>109.1</b>	<b>89.4</b>
			95 <sup>th</sup> % Queue Length (ft)	<b>375</b>	<b>475</b>	650	<b>1,475</b>	--
5	SR 32 & Walnut St	TWSC	LOS	E	C	A	A	<b>A</b>
			Delay (sec/veh)	38.3	21.2	0.0	0.0	<b>0.3</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0	0	--
6	SR 32 & Cherry St	TWSC	LOS	E	C	A	A	<b>A</b>
			Delay (sec/veh)	35.9	22.3	0.1	0.3	<b>1.1</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0	0	--
7	SR 32 & East St	OWSC	LOS		<b>F</b>	A	A	<b>A</b>
			Delay (sec/veh)		<b>121.7</b>	1.1	0.0	<b>5.7</b>
			95 <sup>th</sup> % Queue Length (ft)		<b>125</b>	25	0	--
8	Penn St & East St	OWSC	LOS	A	A	B		<b>A</b>
			Delay (sec/veh)	0.5	0.0	12.0		<b>1.2</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	25		--
9	Penn St & Union St	TWSC	LOS	A	A	A	C	<b>A</b>
			Delay (sec/veh)	0.0	0.3	0.0	15.4	<b>1.6</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	0	25	--
10	Jersey St & Union St	OWSC	LOS	A	A	B		<b>A</b>
			Delay (sec/veh)	0.3	0.0	11.1		<b>0.6</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	25		--
11	Jersey St (future) & Cherry St	N/A	LOS					
			Delay (sec/veh)					
			95 <sup>th</sup> % Queue Length (ft)					

RAB = Roundabout, TWSC = Two-Way Stop Control, OWSC = One-Way Stop Control

XXX indicates the MOE does not meet the criteria thresholds



**Table 6.13 – Capacity Analysis Results for Scenario 4: Design Year No-Build (2042 PM)**

No.	Intersection	Control Type	Parameter	Approach				
				NB	SB	EB	WB	Ovr
1	SR 32 & US 31	Signal	LOS	C	A	C	D	<b>C</b>
			Delay (sec/veh)	34.7	7.8	32.6	48.8	<b>34.4</b>
			95 <sup>th</sup> % Queue Length (ft)	475	50	300	275	--
2	SR 32 & Poplar St/Shamrock Blvd	RAB	LOS	B	A	A	A	<b>A</b>
			Delay (sec/veh)	11.6	7.1	4.3	4.2	<b>4.7</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	100	50	--
3	SR 32 & Mill St/Westlea Dr	TWSC	LOS	<b>F</b>	<b>F</b>	A	A	<b>A</b>
			Delay (sec/veh)	<b>82.8</b>	<b>62.9</b>	0.1	0.3	<b>2.2</b>
			95 <sup>th</sup> % Queue Length (ft)	<b>50</b>	<b>25</b>	0	0	--
4	SR 32 & Union St	Signal	LOS	<b>F</b>	D	<b>F</b>	D	<b>E</b>
			Delay (sec/veh)	<b>86.7</b>	53.3	<b>82.1</b>	38.5	<b>65.8</b>
			95 <sup>th</sup> % Queue Length (ft)	<b>450</b>	250	<b>1,375</b>	<b>875</b>	--
5	SR 32 & Walnut St	TWSC	LOS	D	<b>F</b>	A	A	<b>A</b>
			Delay (sec/veh)	29.3	<b>92.8</b>	0.0	0.1	<b>0.8</b>
			95 <sup>th</sup> % Queue Length (ft)	25	<b>25</b>	0	0	--
6	SR 32 & Cherry St	TWSC	LOS	<b>F</b>	D	A	A	<b>A</b>
			Delay (sec/veh)	<b>53.8</b>	29.6	0.0	0.4	<b>1.1</b>
			95 <sup>th</sup> % Queue Length (ft)	<b>25</b>	25	0	0	--
7	SR 32 & East St	OWSC	LOS		<b>F</b>	A	A	<b>A</b>
			Delay (sec/veh)		<b>239.2</b>	0.3	0.0	<b>5.6</b>
			95 <sup>th</sup> % Queue Length (ft)		<b>125</b>	0	0	--
8	Penn St & East St	OWSC	LOS	A	A	A		<b>A</b>
			Delay (sec/veh)	0.5	0.0	9.7		<b>1.6</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	25		--
9	Penn St & Union St	TWSC	LOS	A	A	A	B	<b>A</b>
			Delay (sec/veh)	0.0	0.2	0.0	14.1	<b>1.0</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	0	25	--
10	Jersey St & Union St	OWSC	LOS	A	A	B		<b>A</b>
			Delay (sec/veh)	0.3	0.0	13.0		<b>1.1</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	25		--
11	Jersey St (future) & Cherry St	N/A	LOS					
			Delay (sec/veh)					
			95 <sup>th</sup> % Queue Length (ft)					

RAB = Roundabout, TWSC = Two-Way Stop Control, OWSC = One-Way Stop Control

**XXX** indicates the MOE does not meet the criteria thresholds

**Table 6.14 – Capacity Analysis Results for Scenario 5A: Design Year Build (2042 AM)**

No.	Intersection	Control Type	Parameter	Approach				
				NB	SB	EB	WB	Ovr
1	SR 32 & US 31	Signal	LOS	D	B	C	D	<b>D</b>
			Delay (sec/veh)	46.8	10.9	33.0	44.6	<b>37.6</b>
			95 <sup>th</sup> % Queue Length (ft)	425	75	400	400	--
2	SR 32 & Poplar St/Shamrock Blvd	RAB	LOS	B	B	A	B	<b>B</b>
			Delay (sec/veh)	12.8	12.5	7.1	18.8	<b>12.7</b>
			95 <sup>th</sup> % Queue Length (ft)	50	150	150	400	--
3	SR 32 & Mill St/Westlea Dr	TWSC	LOS	B	C	A	A	<b>A</b>
			Delay (sec/veh)	12.4	15.6	0.1	0.0	<b>0.4</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0	0	--
4	SR 32 & Union St	Signal	LOS	D	D	B	C	<b>C</b>
			Delay (sec/veh)	42.9	48.7	18.8	25.2	<b>27.7</b>
			95 <sup>th</sup> % Queue Length (ft)	200	250	225	375	--
5	SR 32 & Walnut St	TWSC	LOS	B	B	A	A	<b>A</b>
			Delay (sec/veh)	13.4	13.2	0.0	0.0	<b>0.1</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0	0	--
6	SR 32 & Cherry St	TWSC	LOS	B	B	A	A	<b>A</b>
			Delay (sec/veh)	13.1	14.1	0.0	0.0	<b>0.3</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0	0	--
7	SR 32 & East St	RAB	LOS	A	A	A	A	<b>A</b>
			Delay (sec/veh)	6.7	6.9	4.1	3.9	<b>4.1</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	50	50	--
8	Penn St & East St	OWSC	LOS	A	A	B		<b>A</b>
			Delay (sec/veh)	0.7	0.0	12.2		<b>1.3</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	25		--
9	Penn St & Union St	TWSC	LOS	A	A	A	C	<b>A</b>
			Delay (sec/veh)	0.0	0.3	0.0	15.6	<b>1.6</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	0	25	--
10	Jersey St & Union St	TWSC	LOS	A	A	B	B	<b>A</b>
			Delay (sec/veh)	0.3	0.0	11.3	12.1	<b>0.7</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	25	25	--
11	Jersey St (future) & Cherry St	TWSC	LOS	A	A	A	A	<b>A</b>
			Delay (sec/veh)	9.3	9.2	0.0	0.0	<b>8.3</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0	0	--

RAB = Roundabout, TWSC = Two-Way Stop Control, OWSC = One-Way Stop Control

XXX indicates the MOE does not meet the criteria thresholds



**Table 6.15 – Capacity Analysis Results for Scenario 5A: Design Year Build (2042 PM)**

No.	Intersection	Control Type	Parameter	Approach				
				NB	SB	EB	WB	Ovr
1	SR 32 & US 31	Signal	LOS	D	B	D	E	<b>D</b>
			Delay (sec/veh)	36.9	12.3	36.2	57.8	<b>39.0</b>
			95 <sup>th</sup> % Queue Length (ft)	575	75	450	400	--
2	SR 32 & Poplar St/Shamrock Blvd	RAB	LOS	B	A	A	A	<b>A</b>
			Delay (sec/veh)	12.8	7.4	4.4	4.8	<b>5.2</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	100	75	--
3	SR 32 & Mill St/Westlea Dr	TWSC	LOS	B	B	A	A	<b>A</b>
			Delay (sec/veh)	14.0	12.4	0.1	0.0	<b>0.4</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0	0	--
4	SR 32 & Union St	Signal	LOS	D	C	C	C	<b>C</b>
			Delay (sec/veh)	50.0	32.0	26.2	23.4	<b>29.9</b>
			95 <sup>th</sup> % Queue Length (ft)	350	175	375	250	--
5	SR 32 & Walnut St	TWSC	LOS	C	B	A	A	<b>A</b>
			Delay (sec/veh)	15.1	11.7	0.0	0.0	<b>0.2</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0	0	--
6	SR 32 & Cherry St	TWSC	LOS	C	B	A	A	<b>A</b>
			Delay (sec/veh)	16.5	11.9	0.0	0.0	<b>0.5</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0	0	--
7	SR 32 & East St	RAB	LOS	A	A	A	A	<b>A</b>
			Delay (sec/veh)	8.0	7.9	3.7	3.7	<b>3.8</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	75	50	--
8	Penn St & East St	OWSC	LOS	A	A	A		<b>A</b>
			Delay (sec/veh)	0.7	0.0	9.8		<b>1.6</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	25		--
9	Penn St & Union St	TWSC	LOS	A	A	A	B	<b>A</b>
			Delay (sec/veh)	0.0	0.1	0.0	14.4	<b>1.0</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	0	25	--
10	Jersey St & Union St	TWSC	LOS	A	A	B	B	<b>A</b>
			Delay (sec/veh)	0.3	0.0	13.3	11.6	<b>1.2</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	25	25	--
11	Jersey St (future) & Cherry St	TWSC	LOS	A	A	A	A	<b>A</b>
			Delay (sec/veh)	9.2	9.3	0.0	0.0	<b>8.0</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0	0	--

RAB = Roundabout, TWSC = Two-Way Stop Control, OWSC = One-Way Stop Control

XXX indicates the MOE does not meet the criteria thresholds

**Table 6.16 – Capacity Analysis Results for Scenario 5B: Design Year Build (2042 AM)**

No.	Intersection	Control Type	Parameter	Approach				
				NB	SB	EB	WB	Ovr
1	SR 32 & US 31	Signal	LOS	D	B	C	D	<b>D</b>
			Delay (sec/veh)	46.8	10.9	33.0	44.6	<b>37.6</b>
			95 <sup>th</sup> % Queue Length (ft)	425	75	400	400	--
2	SR 32 & Poplar St/Shamrock Blvd	RAB	LOS	B	B	A	B	<b>B</b>
			Delay (sec/veh)	12.8	12.4	7.1	18.5	<b>12.5</b>
			95 <sup>th</sup> % Queue Length (ft)	50	150	150	400	--
3	SR 32 & Mill St/Westlea Dr	TWSC	LOS	B	C	A		<b>A</b>
			Delay (sec/veh)	14.8	23.7	0.0		<b>0.7</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0		--
4	SR 32 & Union St	Signal	LOS	C	B	B		<b>B</b>
			Delay (sec/veh)	30.0	15.2	11.7		<b>15.7</b>
			95 <sup>th</sup> % Queue Length (ft)	150	75	175		--
5	SR 32 & Walnut St	TWSC	LOS	B	C	A		<b>A</b>
			Delay (sec/veh)	13.3	19.9	0.0		<b>0.3</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0		--
6	SR 32 & Cherry St	TWSC	LOS	B	C	A		<b>A</b>
			Delay (sec/veh)	13.0	19.8	0.0		<b>1.6</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0		--
7	SR 32 & East St	RAB	LOS	A		A	A	<b>A</b>
			Delay (sec/veh)	5.0		4.1	4.2	<b>4.2</b>
			95 <sup>th</sup> % Queue Length (ft)	25		50	50	--
8	Penn St & East St	OWSC	LOS		C		A	<b>A</b>
			Delay (sec/veh)		23.0		0.0	<b>2.4</b>
			95 <sup>th</sup> % Queue Length (ft)		75		0	--
9	Penn St & Union St	Signal	LOS	B	C		C	<b>B</b>
			Delay (sec/veh)	10.1	21.0		20.3	<b>18.9</b>
			95 <sup>th</sup> % Queue Length (ft)	125	250		250	--
10	Jersey St & Union St	TWSC	LOS	A	A	B	A	<b>A</b>
			Delay (sec/veh)	0.3	0.0	11.4	9.9	<b>0.9</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	25	25	--
11	Jersey St (future) & Cherry St	TWSC	LOS	A	A	A	A	<b>A</b>
			Delay (sec/veh)	0.2	0.0	8.5	9.3	<b>2.2</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	25	25	--

RAB = Roundabout, TWSC = Two-Way Stop Control, OWSC = One-Way Stop Control

XXX indicates the MOE does not meet the criteria thresholds



**Table 6.17 – Capacity Analysis Results for Scenario 5B: Design Year Build (2042 PM)**

No.	Intersection	Control Type	Parameter	Approach				
				NB	SB	EB	WB	Ovr
1	SR 32 & US 31	Signal	LOS	D	B	D	E	<b>D</b>
			Delay (sec/veh)	36.9	12.3	36.2	57.8	<b>39.0</b>
			95 <sup>th</sup> % Queue Length (ft)	575	75	450	400	--
2	SR 32 & Poplar St/Shamrock Blvd	RAB	LOS	B	A	A	A	<b>A</b>
			Delay (sec/veh)	12.9	7.5	4.4	5.0	<b>5.4</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	100	75	--
3	SR 32 & Mill St/Westlea Dr	TWSC	LOS	C	D	A		<b>A</b>
			Delay (sec/veh)	17.2	34.9	0.0		<b>1.1</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0		--
4	SR 32 & Union St	Signal	LOS	C	B	B		<b>B</b>
			Delay (sec/veh)	30.8	18.1	14.0		<b>18.3</b>
			95 <sup>th</sup> % Queue Length (ft)	175	150	275		--
5	SR 32 & Walnut St	TWSC	LOS	C	D	A		<b>A</b>
			Delay (sec/veh)	15.4	28.3	0.0		<b>0.6</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0		--
6	SR 32 & Cherry St	TWSC	LOS	C	D	A		<b>A</b>
			Delay (sec/veh)	17.8	32.9	0.0		<b>1.6</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0		--
7	SR 32 & East St	RAB	LOS	A		A	A	<b>A</b>
			Delay (sec/veh)	6.5		3.8	4.2	<b>4.0</b>
			95 <sup>th</sup> % Queue Length (ft)	25		75	50	--
8	Penn St & East St	OWSC	LOS		B		A	<b>A</b>
			Delay (sec/veh)		12.8		0.0	<b>1.0</b>
			95 <sup>th</sup> % Queue Length (ft)		25		0	--
9	Penn St & Union St	Signal	LOS	A	B		C	<b>B</b>
			Delay (sec/veh)	7.5	10.3		23.0	<b>16.2</b>
			95 <sup>th</sup> % Queue Length (ft)	175	150		175	--
10	Jersey St & Union St	TWSC	LOS	A	A	B	B	<b>A</b>
			Delay (sec/veh)	0.3	0.0	14.1	10.7	<b>1.6</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	25	25	--
11	Jersey St (future) & Cherry St	TWSC	LOS	A	A	A	A	<b>A</b>
			Delay (sec/veh)	0.2	0.4	8.5	9.6	<b>4.3</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	25	25	--

RAB = Roundabout, TWSC = Two-Way Stop Control, OWSC = One-Way Stop Control

XXX indicates the MOE does not meet the criteria thresholds

**Table 6.18 – Capacity Analysis Results for Scenario 5C: Design Year Build (2042 AM)**

No.	Intersection	Control Type	Parameter	Approach				
				NB	SB	EB	WB	Ovr
1	SR 32 & US 31	Signal	LOS	D	B	C	D	<b>D</b>
			Delay (sec/veh)	46.8	10.9	33.0	44.6	<b>37.6</b>
			95 <sup>th</sup> % Queue Length (ft)	425	75	400	400	--
2	SR 32 & Poplar St/Shamrock Blvd	RAB	LOS	B	B	A	B	<b>B</b>
			Delay (sec/veh)	11.8	13.9	7.1	15.8	<b>11.8</b>
			95 <sup>th</sup> % Queue Length (ft)	25	175	150	375	--
3	SR 32 & Mill St/Westlea Dr	TWSC	LOS	D	C		A	<b>A</b>
			Delay (sec/veh)	25.4	18.0		0.0	<b>1.6</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25		0	--
4	SR 32 & Union St	Signal	LOS	B	D		B	<b>C</b>
			Delay (sec/veh)	15.8	42.9		18.7	<b>22.7</b>
			95 <sup>th</sup> % Queue Length (ft)	150	250		275	--
5	SR 32 & Walnut St	TWSC	LOS	C	B		A	<b>A</b>
			Delay (sec/veh)	15.1	13.2		0.0	<b>0.1</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25		0	--
6	SR 32 & Cherry St	TWSC	LOS	D	B		A	<b>A</b>
			Delay (sec/veh)	25.2	13.5		0.0	<b>0.3</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25		0	--
7	SR 32 & East St	RAB	LOS	A	A		A	<b>A</b>
			Delay (sec/veh)	3.6	6.9		3.6	<b>3.7</b>
			95 <sup>th</sup> % Queue Length (ft)	50	25		50	--
8	Penn St & East St	OWSC	LOS	A	A	B		<b>A</b>
			Delay (sec/veh)	0.5	0.0	12.0		<b>1.2</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	25		--
9	Penn St & Union St	TWSC	LOS	A	A	A	C	<b>A</b>
			Delay (sec/veh)	0.0	0.3	0.0	15.5	<b>1.6</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	0	25	--
10	Jersey St & Union St	Signal	LOS	B	A	C		<b>B</b>
			Delay (sec/veh)	19.7	2.0	20.7		<b>17.8</b>
			95 <sup>th</sup> % Queue Length (ft)	150	25	200		--
11	Jersey St (future) & Cherry St	TWSC	LOS	B	C	A		<b>A</b>
			Delay (sec/veh)	13.3	21.4	0.0		<b>1.4</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0		--

RAB = Roundabout, TWSC = Two-Way Stop Control, OWSC = One-Way Stop Control

XXX indicates the MOE does not meet the criteria thresholds



**Table 6.19 – Capacity Analysis Results for Scenario 5C: Design Year Build (2042 PM)**

No.	Intersection	Control Type	Parameter	Approach				
				NB	SB	EB	WB	Ovr
1	SR 32 & US 31	Signal	LOS	D	B	D	E	<b>D</b>
			Delay (sec/veh)	36.9	12.3	36.2	57.8	<b>39.0</b>
			95 <sup>th</sup> % Queue Length (ft)	575	75	450	400	--
2	SR 32 & Poplar St/Shamrock Blvd	RAB	LOS	B	A	A	A	<b>A</b>
			Delay (sec/veh)	12.1	7.5	4.4	4.4	<b>4.8</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	100	75	--
3	SR 32 & Mill St/Westlea Dr	TWSC	LOS	C	B		A	<b>A</b>
			Delay (sec/veh)	19.8	14.9		0.0	<b>1.9</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25		0	--
4	SR 32 & Union St	Signal	LOS	C	D		B	<b>C</b>
			Delay (sec/veh)	21.1	36.9		13.4	<b>20.1</b>
			95 <sup>th</sup> % Queue Length (ft)	150	250		175	--
5	SR 32 & Walnut St	TWSC	LOS	C	B		A	<b>A</b>
			Delay (sec/veh)	19.8	14.8		0.0	<b>0.2</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25		0	--
6	SR 32 & Cherry St	TWSC	LOS	C	B		A	<b>A</b>
			Delay (sec/veh)	16.1	12.3		0.0	<b>0.3</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25		0	--
7	SR 32 & East St	RAB	LOS	A	A		A	<b>A</b>
			Delay (sec/veh)	3.6	7.9		3.4	<b>3.7</b>
			95 <sup>th</sup> % Queue Length (ft)	75	25		50	--
8	Penn St & East St	OWSC	LOS	A	A	A		<b>A</b>
			Delay (sec/veh)	0.5	0.0	9.8		<b>1.6</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	25		--
9	Penn St & Union St	TWSC	LOS	A	A	A	B	<b>A</b>
			Delay (sec/veh)	0.0	0.2	0.0	14.1	<b>1.0</b>
			95 <sup>th</sup> % Queue Length (ft)	0	0	0	25	--
10	Jersey St & Union St	Signal	LOS	C	A	C		<b>B</b>
			Delay (sec/veh)	22.6	3.2	20.7		<b>18.4</b>
			95 <sup>th</sup> % Queue Length (ft)	200	25	275		--
11	Jersey St (future) & Cherry St	TWSC	LOS	C	D	A		<b>A</b>
			Delay (sec/veh)	18.0	34.9	0.0		<b>1.1</b>
			95 <sup>th</sup> % Queue Length (ft)	25	25	0		--

RAB = Roundabout, TWSC = Two-Way Stop Control, OWSC = One-Way Stop Control

XXX indicates the MOE does not meet the criteria thresholds

## 7.0 Network Performance Measures

While the information contained in **Section 6.0** summarizes performance of individual intersections by delay, LOS, and queue length, the tables in this section combine and summarize four (4) performance measures for all intersections in the network: total delay, total stops, total travel time, and total fuel consumption. The performance measures were calculated (not field-measured) by the Synchro model. The model summarizes data for all vehicles in the network. The network performance measures developed by Synchro can be found in **Table 7.1** and **Table 7.2** for the AM and PM peak, respectively.

**Table 7.1 – Synchro Network Performance Measures (AM Peak Hour)**

Performance Measures	Scenario				
	Scenario 2 Opening Year 2022 (No-Build)	Scenario 4 Design Year 2042 (No-Build)	Scenario 5A Design Year 2042 (4-Lane)	Scenario 5B Design Year 2042 (SR 32 EB)	Scenario 5C Design Year 2042 (SR 32 WB)
Total Delay (hr)	73	265	73	69	71
Total Stops	7,731	10,086	10,571	10,834	10,856
Total Travel Time (hr)	151	356	168	150	163
Fuel Consumed (gal)	184	353	218	196	211

**Table 7.2 – Synchro Network Performance Measures (PM Peak Hour)**

Performance Measures	Scenario				
	Scenario 2 Opening Year 2022 (No-Build)	Scenario 4 Design Year 2042 (No-Build)	Scenario 5A Design Year 2042 (4-Lane)	Scenario 5B Design Year 2042 (SR 32 EB)	Scenario 5C Design Year 2042 (SR 32 WB)
Total Delay (hr)	80	430	89	82	83
Total Stops	8,179	11,509	11,631	11,878	11,698
Total Travel Time (hr)	164	527	192	174	182
Fuel Consumed (gal)	201	491	248	227	233

As shown in the tables above, the Scenario 4 Design Year 2042 (No-Build) PM peak results in a substantial increase in total delay and total travel time as compared to the three Scenario 5 design alternatives. The 4-lane design alternative (5A) is anticipated to result in fewer stops during both the AM and PM peak scenarios when compared to the one-way pair options (5B and 5C). In general, the results indicate that all three design alternatives are anticipated to result in improved operations along SR 32. The two one-way pair options are anticipated to improve the conditions as compared to the no-build scenario, with neither option being superior.



## 8.0 Alternative Intersection Control Types

So as to provide a wide-ranging analysis, alternative control types were considered at multiple locations throughout the SR 32 corridor for the multiple scenarios and alternatives.

### 8.1 SR 32 & Poplar Street / Shamrock Boulevard

Due to the recent construction of the SR 32 & Poplar Street / Shamrock Boulevard roundabout, and the ability to expand the capacity utilizing the existing pavement, reverting to a signalized intersection at this location was not considered.

### 8.2 SR 32 & Union Street

A roundabout was preliminarily considered at this intersection throughout the initial analysis. However, due to concerns with the amount of space required to accommodate a properly sized roundabout, further analysis was not completed. For Design Year 2042 Build (Scenario 5), it is anticipated that a two-lane roundabout with turn lanes, similar in design to the SR 32 & Poplar Street / Shamrock Boulevard roundabout would be required. This would potentially impact all four (4) corners of this historically sensitive intersection, in addition to impacting the existing park. Therefore, additional analysis was not provided.

### 8.3 SR 32 & East Street

A signalized intersection was discussed at the SR 32 & East Street intersection during preliminary analysis and discussions with INDOT and City of Westfield staff. The final configuration of Design Year 2042 Build (Alternative A), which included four (4) lanes and implementing access management strategies along SR 32, resulted in the need to provide U-turn movements at both ends of the corridor in order to accommodate the right-turning only traffic at the existing side-streets. These vehicles need to be provided a safe and reliable mechanism for heading in their intended direction without forcing all of these movements to the traffic signal at SR 32 & Union Street. Due to safety and access concerns with requiring these U-turn movements at a signalized intersection, only a roundabout was analyzed at the SR 32 & East Street intersection.

## 9.0 Findings and Recommendations

Based on capacity analysis and field observations of the existing conditions, SR 32 in downtown Westfield is known to experience congestion during the 2019 AM and PM peak hours. The Synchro analysis has shown that the 95<sup>th</sup> percentile queue length at SR 32 & Union Street exceeds 950 feet for the westbound approach in the AM and 900 feet for the eastbound approach in the PM. Due to the extensive queuing on SR 32 at Union Street, traffic flow is impeded at other driveways and major intersections along the corridor. In particular, the Poplar Street/Shamrock Boulevard roundabout is negatively impacted when slowed or stopped vehicles on SR 32 create a gridlock and prevent other vehicles from entering the roundabout. Slowed/stopped traffic through a roundabout compromises the safety of the intersection as drivers expectations change and typical gaps in traffic are no longer available. Since the north leg of the roundabout provides access to Riverview Health and the Westfield Intermediate and Middle Schools, safety at the roundabout is of the utmost concern.

By the projected Opening Year (2022) of the project, development is expected to be in place along SR 32 west of US 31. The development is anticipated to increase traffic volumes on SR 32 in downtown Westfield, which is expected to worsen the aforementioned conditions. During the Opening Year 2022 (Scenario 2) AM and PM peak hours, the Synchro analysis shows that several movements will operate at LOS F and the 95<sup>th</sup> percentile queue lengths exceed 1,000 feet for the respective peak directions. Widening of SR 32 will be required in order to mitigate the congestion issues.

Based upon the analysis of the design alternatives and the recommended geometrics, all alternatives are anticipated to operate within the level of service, delay, and queue standards established at the outset of this study for Design Year 2042 Build (Scenario 5). These findings will be included in the Environmental Assessment which is anticipated to analyze the full impacts of these scenarios.

The 4-lane design alternative with access management (Scenario 5A) is anticipated to result in fewer stops during both the AM and PM peak scenarios when compared to the one-way pair options (Scenarios 5B and 5C) based on the Synchro network performance measures. In general, the results indicate that all three design alternatives are anticipated to result in improved operations along SR 32. The two one-way pair options are anticipated to improve the conditions as compared to the no-build scenario, with neither option being superior.





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## M E M O R A N D U M

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**DATE:** October 16, 2019  
**TO:** SR 32 Westfield Reconstruction Design Team  
**FROM:** Gannon Grimmer, PE, Patrick O'Connor, PE, PTOE  
**RE:** SR 32 Westfield Reconstruction – Traffic Analysis for Modified Access at Union Street

---

### *Introduction*

Based upon comments received during the public comment period, an additional traffic analysis has been completed for the SR 32 Westfield Reconstruction Project. An alternative was recommended in which the SR 32 & Union Street intersection is modified to: (1) a right-in/right-out (RIRO) intersection, or (2) no access to vehicular traffic. The goal of these alternatives is to prevent widening at the intersection of SR 32 & Union Street in order to preserve the historic district. The purpose of this memorandum is to document the traffic analysis and findings.

### *Description of Alternative Concepts*

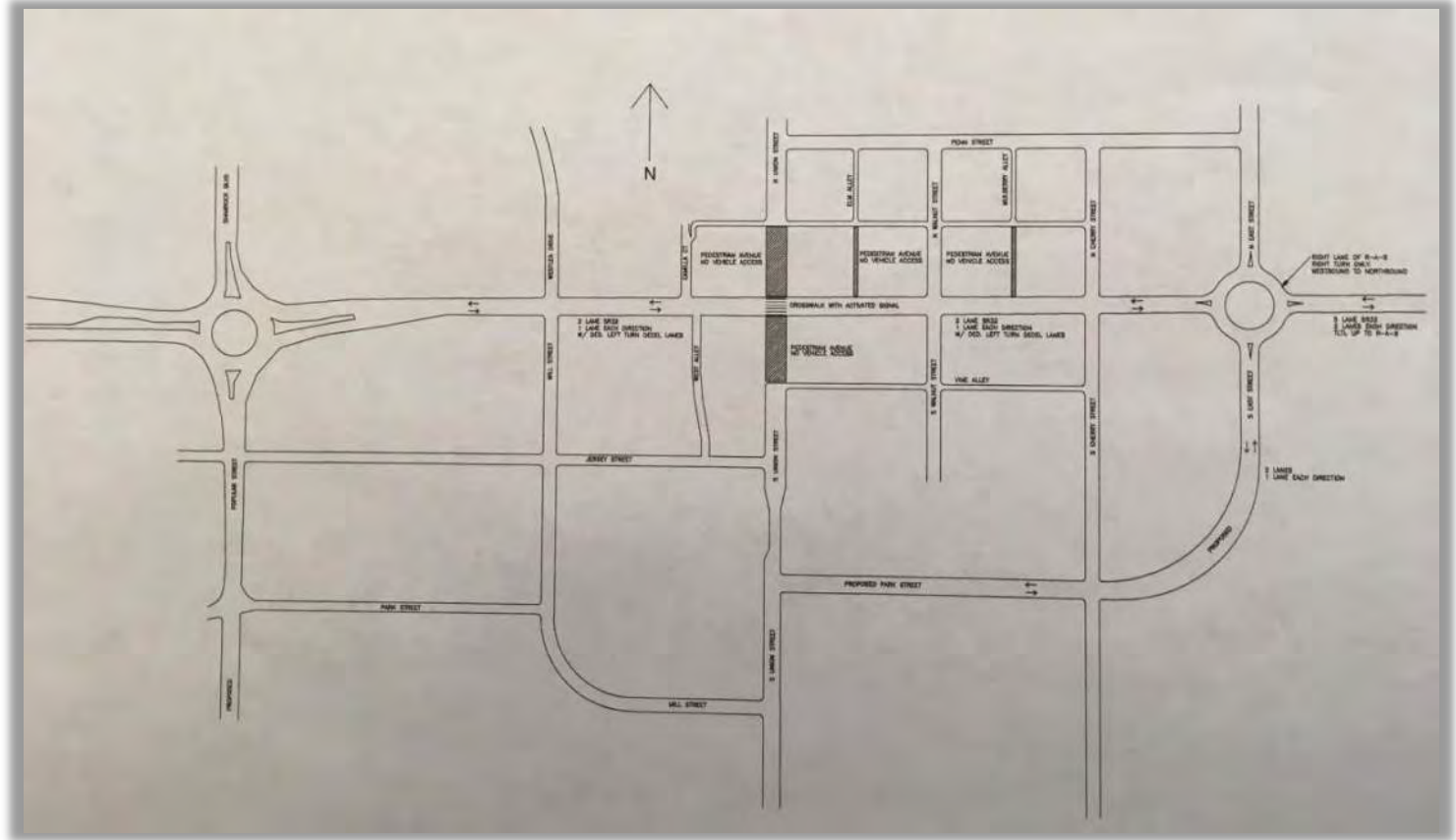
For the purposes of this analysis, SR 32 is assumed to be widened to four (4) lanes from Poplar Street to East Street. Additionally, SR 32 would be required to be an undivided section from approximately Mill Street to Walnut Street due to right-of-way restrictions which are required to minimize impacts on the existing structures in the historic district. The future extension of Jersey Street is also assumed to be constructed, as this is critical to the functionality of these concepts. It is anticipated that due to the free-flow nature of SR 32 through this intersection that pedestrian accommodations, such as a signal or HAWK, would be required in order to provide safe access for pedestrians crossing SR 32.

#### Right-In/Right-Out

In this concept, access at SR 32 & Union Street would be restricted to a RIRO only intersection. This only allows for right turns on/off of SR 32. With this configuration, all left turns at the intersection would be prohibited, and through movements along Union Street would also be prohibited.

#### No Access

In this concept, no access to Union Street would be allowed at SR 32. Vehicle access on Union Street would be terminated approximately 200' north and south of SR 32 at the nearby alleys. This creates a plaza-like design at the node of the SR 32 & Union Street intersection, in which only pedestrian access is permitted. With this configuration, only east-west through movements along SR 32 would be possible. A rough sketch of the No Access concept is shown in **Figure 1**, as provided during the public comment period. This sketch was included for conceptual purposes only.



**Figure 1 – Sketch of No Access Concept**

### *Traffic Volume Redistribution*

The restricted access at SR 32 & Union Street would require local drivers to find alternate routes through downtown Westfield. The majority of redistributed traffic is expected to be pushed toward the existing Poplar Street roundabout or the proposed East Street roundabout at either end of the study corridor. Drivers would then utilize the minor local roadway network to get back to Union Street to continue to their destination.

Traffic volumes were redistributed based on a methodology of identifying the next most logical route for traffic based on the respective concept. Since origin-destination data is not available, traffic volumes were assumed to be redistributed with the most practical route available.

### *Capacity Analysis*

A capacity analysis was evaluated for both concepts to determine their feasibility from a traffic operations standpoint. The capacity analysis was completed based upon the Synchro and SIDRA files from the *SR 32 Westfield Reconstruction Traffic Operations Analysis* approved by INDOT on May 30, 2019. The analysis of these alternative concepts followed the same methodologies utilized in the Traffic Operations Analysis report. The results of the capacity analysis are summarized in the following sections. Pedestrian operations and impacts were not included in the analysis.

### Right-In/Right-Out

Based on the anticipated traffic volume redistribution for the RIRO concept, a heavy volume of eastbound and westbound right turns are expected to occur during the peak hours at SR 32 & Union Street. The right-turn volume in both directions is high enough to warrant dedicated right-turn lanes on SR 32. Due to the need for



dedicated right-turn lanes (and thus required widening to SR 32), this alternative concept is not considered to meet the goal of this analysis and will not be evaluated further.

#### No Access

The capacity analysis for the No Access concept mainly focuses on the roundabouts at Poplar Street and at East Street, as these intersections are anticipated to experience the highest increase in traffic, and thus would be critical to the performance of the corridor. The capacity analysis results for the roundabout intersections are summarized in **Table 1**. These traffic volumes reflect Scenario 5A from the traffic study and account for the redistribution of traffic based on modified access at SR 32.

**Table 1 – Capacity Analysis Results: 2042 AM and PM Peak Hour**

Intersection	Approach	2042 AM			2042 PM		
		Delay (sec/veh)	LOS	95 <sup>th</sup> % Queue Length (ft)	Delay (sec/veh)	LOS	95 <sup>th</sup> % Queue Length (ft)
SR 32 & Poplar St	NB	14.0	B	75	13.7	B	50
	SB	11.4	B	125	7.7	A	25
	EB	7.1	A	150	4.4	A	100
	WB	22.1	C	425	5.7	A	75
	<b>Overall</b>	<b>13.7</b>	<b>B</b>	<b>--</b>	<b>6.0</b>	<b>A</b>	<b>--</b>
SR 32 & East St	NB	5.4	A	25	8.5	A	75
	SB	8.1	A	25	8.9	A	50
	EB	5.9	A	50	6.5	A	100
	WB	5.5	A	75	5.7	A	75
	<b>Overall</b>	<b>5.9</b>	<b>A</b>	<b>--</b>	<b>6.7</b>	<b>A</b>	<b>--</b>

The capacity analysis results from **Table 1** show that both roundabouts are expected to operate at LOS C or better during the peak hours, and the 95<sup>th</sup> percentile queue lengths at all approaches show that there would be minimal impacts to adjacent intersections. These results indicate that the roundabouts are capable of handling the additional traffic at an acceptable level of performance.

Impacts were also considered for all of the intersections on Penn Street and Jersey Street that are anticipated to have a large increase in traffic volumes or a major shift in traffic patterns. The capacity analysis for these stop-controlled intersections showed that all are expected to operate at LOS C or better during the peak hours without any significant queuing concerns. These results indicate that the other intersections impacted by new traffic patterns are capable of handling the additional traffic at an acceptable level of performance.

The future extension of Jersey Street is worth noting with regard to this proposed concept. An evaluation of the Poplar Street roundabout (without the construction of the Jersey Street extension) showed that the roundabout operations would degrade to the point in which the intersection no longer provides an acceptable level of performance. Therefore, the Jersey Street extension is required in order for the No Access concept to be feasible.

#### *Network-Related Traffic Impacts*

The capacity analysis in the previous section of this memo mainly focused on the potential impacts to the SR 32 corridor at an intersection-level only. However, the redistribution of traffic volumes and the alteration of current traffic patterns also has an impact on other traffic performance measures.

## Penn Street

Penn Street is expected to have a large increase in traffic volumes based on the traffic volume redistribution assumptions. The current AADT on Penn Street is estimated to be 750 vpd, and the projected AADT on Penn Street with the No Access concept is estimated to be 6,000 vpd. This increase in traffic would likely require new pavement on Penn Street and require the removal of parking spaces in close proximity to Union Street and East Street. Additionally, the increase in traffic could potentially be a disruption to residents who live on Penn Street.

## Travel Time

An overall increase in travel time is another impact of the No Access alternative. Due to the limited access on SR 32, local users of the roadway network will be subjected to finding alternate routes. These routes will mostly consist of low-speed roadways and will require a further distance to be traveled than the current condition. The increase in network travel time was quantified by comparing a “before” and “after” scenario in which equivalent routes were used as the basis of the comparison. The travel time comparison is summarized in **Table 2**. The travel times were calculated based on distance traveled divided by posted speed.

**Table 2 – Travel Time Comparison**

Condition	Travel Time (min)
“Before” (Full Access at Union Street)	4.7
“After” (No Access at Union Street)	10.0
Difference	+ 5.2

The “before” and “after” travel time values are relative to their points of measurement and should be considered arbitrary. However, the **difference** in the values reflects the actual increase in travel time that is expected to occur for all vehicle routes (combined) which will be impacted by the removal of access at Union Street. The travel time comparison shows that the average added travel time for vehicles will be approximately five (5) minutes.

A monetary value can be applied to the increase in travel time as it relates to the estimated value of delay time for vehicle drivers and passengers. The *2019 Urban Mobility Report* published by The Texas A&M Transportation Institute estimates the “value of delay time for personal travel at \$18.12 per person per hour.” This value of delay time was applied to the expected increase in travel time for the total volume of weekday drivers that will be impacted across the period of an entire year. Based on the calculations, the estimated annual cost attributed to an increase in travel time is **\$1.0M per year** for all combined drivers impacted by the removal of access at Union Street.

## Pedestrian Crossing

A protected pedestrian crossing on SR 32 will need to be provided in lieu of removing the traffic signal at the intersection at Union Street. The City of Westfield has expressed the desire for a protected pedestrian crossing to remain in the core of downtown. A high-intensity activated crosswalk beacon (HAWK) would likely be provided in replacement of the traffic signal.

The presence of a HAWK, or another type of pedestrian crossing beacon, is noteworthy as it means that SR 32 will not be completely free-flow with the No Access concept. Operations on SR 32 will behave similarly as if a signal was still present at Union Street. Therefore, it is unlikely that the No Access concept provides travel time savings for through vehicles along SR 32 while greatly impacting the travel times for all other movements that utilize this intersection.



## *Findings*

The findings of the alternative concept evaluation are summarized as follows:

- The RIRO concept does not meet the goal of the alternative
  - Widening at SR 32 & Union Street required
- No Access concept does not meet the goal of the alternative
  - Jersey Street extension must be constructed
  - AADT on Penn Street increases to approximately 6,000 vpd
  - Added travel time cost of \$1.0M per year
  - Required installation of pedestrian accommodations (signal, HAWK)

While the No Access concept appears to meet the goal of the alternative analysis by avoiding widening at the node of the SR 32 & Union Street intersection, there are several ancillary impacts to the community that are not prudent to the overall goal of the SR 32 Westfield Reconstruction project.



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## M E M O R A N D U M

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**DATE:** January 22, 2020  
**TO:** SR 32 Westfield Reconstruction Design Team  
**FROM:** Gannon Grimmer, PE, Patrick O'Connor, PE, PTOE  
**RE:** SR 32 Westfield Reconstruction – Traffic Analysis for Jersey Street Extension

---

### *Introduction*

The purpose of this memorandum is to summarize the traffic operations for the SR 32 Westfield Reconstruction study corridor without the Jersey Street extension. The *SR 32 Westfield Reconstruction Traffic Operations Analysis* (TOA), dated May 30, 2019, had assumed that the Jersey Street extension would be implemented prior to the beginning of construction of the SR 32 widening project. Therefore, the capacity analysis conducted for the TOA assumed traffic would be able to use Jersey Street and have been included in this memorandum to serve as comparison to the original analysis.

Due to the nature of the funding for the SR 32 widening project, the Jersey Street extension must be considered a separate project, and the traffic analysis should be re-evaluated without Jersey Street. This traffic analysis was conducted for a scenario *without* the Jersey Street extension to determine if any additional improvements would be required due to a different set of traffic patterns. This memorandum documents the traffic analysis and findings.

### *Description of Jersey Street Extension*

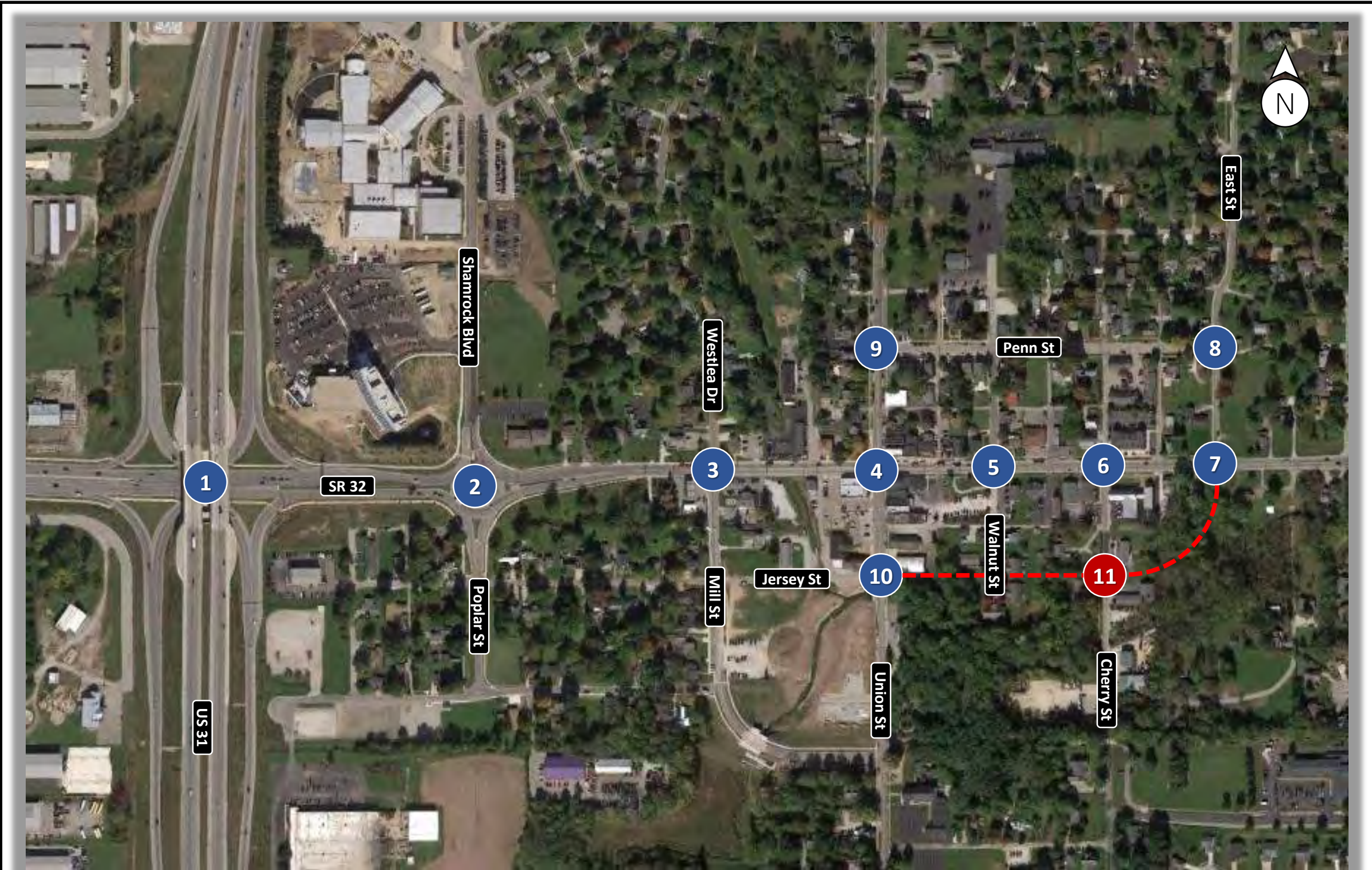
The proposed Jersey Street extension spans from Union Street to East Street with a tie-in at SR 32. A conceptual alignment of the Jersey Street extension is shown in **Figure 1**. This figure includes all of the study intersections from the TOA to provide additional context for this memo. The following two (2) scenarios will be referenced throughout this memorandum:

- Scenario 1 – With the Jersey Street extension (from TOA)
- Scenario 2 – Without the Jersey Street extension

### *Traffic Volumes*

The traffic volumes for Scenario 1 reflect the same volume matrix that was used for the analysis in the previously referenced TOA. The traffic volumes for Scenario 2 reflect a redistribution of traffic through the study area without the proposed Jersey Street extension. The only significant change in traffic patterns is with the westbound left-turn movement from SR 32. It was assumed these left turns would shift from Jersey Street to Union Street. The remaining traffic volumes were redistributed to access SR 32 from the existing side streets and not the proposed connection at Jersey Street & SR 32.





 <p>AMERICAN <b>STRUCTUREPOINT</b> INC.</p>	<p><b>Legend</b></p> <p>① Intersection Number (Existing)</p> <p>⑪ Intersection Number (Future)</p> <p>--- Jersey Street Extension</p>	<p>SR 32 Reconstruction Westfield, IN</p>	<p><u>Figure 1</u> Study Area w/ Jersey Street Extension</p>
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## Capacity Analysis

A capacity analysis was performed for the new scenario without the Jersey Street extension to compare to the previous results from the TOA for the scenario with the Jersey Street extension. The analysis followed the same methodology procedures that were utilized in the original TOA and approved by INDOT staff. The Jersey Street extension will impact traffic patterns for Alternative A and Alternative B from the TOA and were evaluated for this memorandum. Alternative C, however, requires the Jersey Street extension; therefore, Alternative C was not further evaluated. A description of each of the design alternatives from the TOA is provided in **Table 1** for reference.

**Table 1 – SR 32 Design Alternatives**

Alternative	Roadway Network
A	SR 32 4-Lane Section (with Access Management)
B	One-Way Pair (SR 32 EB, Penn Street WB)
C	One-Way Pair (SR 32 WB, Jersey Street EB)

A summary of the LOS results comparison for the Jersey Street scenarios is provided in **Table 2**. The LOS values represent the worst-case overall intersection performance for the design year 2042 peak hour.

**Table 2 – LOS Summary**

Intersection	Scenario 1* (w/ Jersey Street)		Scenario 2 (w/o Jersey Street)	
	Alt A	Alt B	Alt A	Alt B
SR 32 & Union St	C	C	C	C
SR 32 & East St	A	A	A	A

*\*From TOA dated 5/30/2019*

The capacity analysis results from **Table 2** indicate that both of the major intersections that would be impacted by the Jersey Street extension are expected to operate at the same LOS with or without Jersey Street for both Alternative A and Alternative B.

## Findings

The capacity analysis has shown that the major intersections along the SR 32 study corridor are expected to operate at the same LOS with and without the Jersey Street extension. Based upon these results, no additional intersection improvements would be required (beyond those already recommended in the TOA) in the event that the Jersey Street extension does not get constructed prior to the SR 32 widening project.

Due to the existing roadway connectivity along SR 32 through the study area, the extension of Jersey Street is not expected to cause a major shift in traffic patterns. Most traffic will likely keep using the same routes as today with the exception of westbound left turns at the intersection of SR 32 & Union Street. Since the peak hour volume of these left turns is less than 30 vehicles per hour, this results in the negligible change in intersection delay of both scenarios.



# Appendix D



July 15, 2019

Subject: State Road 32 in Westfield

**Mayor**  
Andy Cook

**City Council**  
Jim Ake  
Steven Hoover  
Robert L. Horkay  
Charles Lehman  
Joe Edwards  
Cindy L. Spoljaric  
Mark Keen

**Clerk Treasurer**  
Cindy J. Gossard

To: Whom It May Concern

This letter is written to formally clarify the City of Westfield's position on the subject of decommissioning State Road 32 in Westfield, Indiana.

The City of Westfield is adamantly against decommissioning State Road 32 through its downtown area. The City does not have maintenance dollars budgeted towards the long-term maintenance of this roadway, nor do we have the desire to maintain a road which has functioned as an east-west state route since before the City of Westfield became a city.

A decommissioning of State Road 32 would represent a tremendous burden to our taxpayers and would result in other vital infrastructure projects being delayed or cancelled to cover the long-term costs of maintaining State Road 32. It would be unpalatable from both a financial and programmatic standpoint.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Nail".

John Nail  
City Engineer  
City of Westfield

**Public Works Department**

(317) 804-3100 office  
(317) 804-3190 fax

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Westfield, IN 46074  
**westfield.in.gov**



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**From:** McCoy, Dan  
**Sent:** Friday, July 12, 2019 2:35 PM  
**To:** Beck, Jennifer <[JBeck@indot.IN.gov](mailto:JBeck@indot.IN.gov)>  
**Cc:** VanVleet, Jeremy <[JVanVleet@indot.IN.gov](mailto:JVanVleet@indot.IN.gov)>  
**Subject:** RE: SR 32 Memo's Request

Jennifer,

Regarding the letter from SHPO for the SR 32 Westfield project, the idea of a roadway transfer and rerouting of traffic is not reasonable or feasible. Other projects cited in the letter had the benefit of established "bypass" roadways on which to put displaced traffic. SR 32 is the major east-west thoroughfare for Westfield and Noblesville and relied upon by a significant amount of commuter traffic each day. Whether or not this traffic could be described as through traffic is immaterial to the case since the interchange of US 31 at SR 32 forms a major connection point via the US 31 freeway to I-465 at the west end of the SR 32 corridor. Traffic data shows that US 31 at SR 32 is a destination point in addition to downtown Westfield itself. Of great significance is the fact that INDOT and FHWA invested millions of dollars into the US 31 Hamilton County freeway and the interchange at SR 32 to provide improved safety and traffic operations, access, connectivity and increased opportunities for economic development. Disallowing the traveling public from using SR 32 via a road transfer or any other means would call into question the prior investment and the environmental study on which the US 31 freeway was founded. Furthermore, the communities of Westfield and Noblesville have not expressed any interest in a SR 32 road transfer agreement. However, both cities are interested in safety and capacity improvements on the SR 32 corridor. Even if such an agreement were to be reached and truck traffic routed on another road, the high passenger car traffic volumes would still use the corridor as it is the shortest path to the US 31 freeway.

Thank you,

Daniel McCoy, P.E.  
Corridor Development Office  
INDOT Traffic Engineering Division  
[dmccoy@indot.in.gov](mailto:dmccoy@indot.in.gov)  
317-233-3943



WEINTRAUT & ASSOCIATES, INC.

**ATTACHMENT F. Consultation**





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## MEETING MINUTES

**Location:** Westfield City Hall, 130 Penn Street, Westfield, Hamilton County, Indiana

**Date:** May 20, 2019

**Project Name:** State Road 32 Reconstruction (Des. No. 1801731)

**Project No.:** 2018.01349

**Consulting Party** Briana Hope, Sarah Everhart, Ken Olson, Tanner McKinney (American Structurepoint, Inc.)

**Attendees:**

John Nail (City of Westfield)

Dr. Linda Weintraut, Bethany Natali (Weintraut & Associates)

Beth McCord, John Carr (IDNR, Division of Historic Preservation and Archaeology)

Patrick Carpenter, Anu Kumar, Kelyn Alexander (INDOT, Cultural Resources)

Jennifer Beck (INDOT Greenfield District)

Michelle Allen (Federal Highway Administration)

Sam Burgess (Indiana Landmarks)

Judith Stanley Shuck (Adjacent Property Owner)

Susan Boyer (Westfield Preservation Alliance)

**Attendees** Gloria Del Greco (Purdue Extension),

**Observing** Linda Nass (Resident)

**Meeting:** Will Lyon (American Structurepoint, Inc.)

1. The meeting was held at 1:00 p.m., May 20, 2019, to introduce and discuss the State Road (SR) 32 Reconstruction project, the Section 106 process, review of potential historic properties and district, and the next steps in the Section 106 process.
2. John Nail (City of Westfield) began the meeting with a general overview of the interlocal agreement between Westfield and INDOT and discussed the current planned developments in Westfield that are independent of the proposed SR 32 Reconstruction project. In addition to Grand Junction Plaza, the Jersey Street extension is a locally funded project; Jersey Street will connect with Main Street at East Street. There will also be a developer initiated project by Old Towne Development that will be located between Jersey and Main streets. These are projects that are not dependent upon the SR 32 project and would occur even if it does not.
3. Gloria Del Greco (Purdue Extension) asked about the consideration of pedestrian safety while planning this project and other Westfield developments. John Nail and Ken Olson (Structurepoint) confirmed that pedestrian safety is being considered during planning.
4. Briana Hope (Structurepoint) began introductions around the room. She gave an overview of the project, the purpose and need, and the project schedule (presentation attached).
5. Ken Olson gave an overview of the three alternatives and the process moving forward to evaluate impacts for each of the alternatives (presentation attached).

6. John Carr (IDNR-DHPA) asked if SR 32 will remain two lanes east of the limits of this project. Jennifer Beck (INDOT) indicated that there is currently a corridor study being completed by INDOT for the SR 32 corridor through this area. At this time, funding has not been dedicated to any future projects east of the limits of the SR 32 Project.
7. Judith Stanley Shuck (Property Owner) asked if residents could submit ideas for alternatives. Briana Hope confirmed that submissions were welcome and encouraged. Ms. Shuck indicated that there are some sketches of alternatives currently and at least one possible CAD drawing.
8. Gloria Del Greco (Purdue Extension) asked if there are any streetscape figures for the alternatives. Mr. Olson indicated that there are none available because the alternatives are in the initial stages. Ms. Del Greco asked if a five lane corridor with a median boulevard was being evaluated at this time. Mr. Olson indicated that alternative is being evaluated and would be similar to what has been shown in past studies, but other options are also being evaluated at this time.
9. Linda Nass (Resident) asked if there would be traffic counts for SR 32 that were separated into eastbound and westbound travel. Ken Olson confirmed that counts had been taken and were in the draft traffic study. Ms. Nass expressed interest in comparing those traffic counts to the current SR 32 project in Noblesville, as well as the segment of SR 32 between Westfield and Noblesville. Mr. Olson confirmed that INDOT maintains counts and could provide them for comparison.
10. Bethany Natali (Weintraut & Associates) provided a general overview of the Section 106 process, what it means to be a Consulting Party, and potential historic properties that have been identified (presentation attached). Ms. Natali encouraged the submission of any local information on historic properties or the district.
11. Ms. Shuck said that all were invited to come view her house inside and outside, as well as speak with her on the history. It was built in the nineteenth century and remodeled to look like a bungalow.
12. Ms. Hope asked for additional questions.
13. Mr. Carr noted that INDOT and consultants can't ask to see the interior of structures for evaluation, but asked if INDOT and consultants could enter when the property owner gives an invitation. Patrick Carpenter (CRO) indicated that consultants can enter a structure if invited by the property owner.
14. Ms. Hope concluded the meeting by informing attendees of the next steps: the Historic Property Report will be compiled, the consulting parties will be notified, and the report will be posted to INSCOPE, INDOT's online portal for review and comment. Any consulting party needing a hard copy may request one. Another Consulting Party meeting will be scheduled once the Historic Property Report is released. Since there were no additional questions, Ms. Hope thanked everyone for attending and adjourned the meeting.

## **GENERAL CONCERNS**

- Safety of pedestrians should be a concern in the design of the project.

## **ACTION ITEMS**

- Judith Stanley Shuck, as well as any other residents, to forward any ideas, sketches, or CAD drawings of alternatives to American Structurepoint, Inc. and the City of Westfield.
- Consulting parties to be notified when the Historic Property Report has been released.
- A future meeting to be scheduled once the Historic Property Report has been released.

The minutes of this meeting as described above represent the writer's interpretation of the discussions of the meeting. If your interpretation differs substantially, or if there are items that were overlooked, please contact me at (317) 547-5580 or severhart@structurepoint.com to revise the record.

Very truly yours,  
American Structurepoint, Inc.



Sarah J. Everhart  
Environmental Specialist

SJE:

Enclosures



## INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue  
Room N642  
Indianapolis, Indiana 46204

PHONE: (317) 234-5168

**Eric Holcomb, Governor**  
**Joe McGuinness,**  
**Commissioner**

January 17, 2020

This letter was sent to the listed parties.

Re: DUAL REVIEW: State Road 32 Reconstruction in the City of Westfield, Washington Township, Hamilton County (Des. No. 1801731; DHPA 23531)

Dear Consulting Party (see attached list):

The City of Westfield, with funding from the Federal Highway Administration and administrative oversight from the Indiana Department of Transportation (INDOT), proposes to proceed with the State Road 32 (SR 32) Westfield Reconstruction Project (Des. No. 1801731). American Structurepoint, Inc. is under contract with the City of Westfield to advance the environmental documentation for the referenced project.

The intent of this letter and attachments is to respond to questions and statements posed by consulting parties in response to the consulting parties meeting (May 20, 2019), the distribution of the meeting minutes (June 19, 2019) and Historic Property Report (September 5, 2019).

The proposed undertaking is along SR 32 roughly extending from Poplar Street east to Timberbrook Run and from Jersey Street north to Penn Street in Westfield, Hamilton County, Indiana. It is within Washington Township, Westfield and Noblesville United State Geological Survey (USGS) 7.5 Minute Quadrangle Map in Section 36, Township 19 North, Range 3 East; Section 31, Township 19, Range 4 East; Section 1 Township 18 North, Range 3 East; and Section 6, Township 18 North, Range 4 East.

The purpose of the proposed project is to improve corridor mobility along SR 32 through the downtown Westfield area for both motorists and pedestrians alike. Currently, the existing corridor does not provide a safe traveling environment for motorists or pedestrians, as the existing roadway is overly congested.

Proposed project alternatives being considered at this time include roadway reconstruction of SR 32 that could include added travel lanes and turn lanes, new curb and gutter, new sidewalks, new storm sewer, new lighting, and intersection improvements at Union Street and East Street. Other alternatives being considered include utilizing a one-way pair along Jersey Street and the existing roadway of SR 32 or along Penn Street and the existing roadway of SR 32.

In addition, an alternative posed by local residents is also being evaluated. During a meeting with Ms. Judith Shuck on August 20, 2019, she proposed an alternative to maintain the existing typical roadway section of SR 32 by removing vehicle access to Union Street (north and south) from SR 32. This alternative would be along the same alignment as Alternate A (widening of SR 32) and therefore, would not require a revision to the APE proposed in the HPR. This alternative is currently being evaluated as part of the alternative analysis. If additional alternatives are proposed and deemed worthy of further study, the APE would be re-evaluated.



It is anticipated that additional permanent and temporary right-of-way would be required to complete the proposed project. However, it is unknown at this time how much temporary and permanent right-of-way would be needed. It is also anticipated that multiple relocations may be required to complete the project depending on the chosen alternative.

On June 12, 2019, the Indiana State Historic Preservation Officer (SHPO) suggested an alternative to turn over control of SR 32 to the City of Westfield and direct truck traffic onto other state/interstate routes (for example, diverting truck traffic to SR 38, SR 37, or I-69 depending on the intended direction of travel). The consultants have evaluated that suggestion. Currently, the traffic is the most congested during peak hour volumes (7:00 AM – 9:00 AM, 4:00 PM – 6:00 PM). Based on data from the ongoing traffic analysis, the percentage of truck traffic is approximately 2 percent during peak hours. Due to the small percentage of truck traffic, redirecting the truck traffic away from SR 32 would not address the overall traffic congestion issues during the peak hours. Additionally, in a letter dated July 15, 2019, the City of Westfield stated that it is opposed to decommissioning SR 32 through the downtown area. The City has not budgeted for the long-term maintenance of the roadway, and relinquishment would burden taxpayers, as well as result in other vital infrastructure projects being delayed or cancelled to cover the long-term maintenance costs of the relinquishment of SR 32 through downtown Westfield.

A memo from the INDOT Corridor Development Office states that an alternative that decommissions SR 32 and redirects truck traffic is not reasonable or feasible: According to the memo, “...the interchange of US 31 and SR 32 forms a major connection point via the US 31 freeway to I-465 at the west end of the SR 32 corridor. Traffic data shows that US 31 at SR 32 is a destination point in addition to downtown Westfield itself. Of great significance is the fact that INDOT and FHWA invested millions of dollars into the US 31 Hamilton County freeway and the interchange at SR 32 to provide improved safety and traffic operations, access, connectivity and increased opportunities for economic development. Disallowing the traveling public from using SR 32 via a road transfer or any other means would call into question the prior investment and the environmental study on which the US 31 freeway was founded...Even if such an agreement were to be reached and truck traffic routed on another road, the high passenger car traffic volumes would still use the corridor as it is the shortest path to the US 31 freeway...” Decommissioning SR 32 would not address the need of the project, to provide an efficient traveling environment for motorists or pedestrians, as the existing roadway is congested, nor does it address the purpose of the project, to improve corridor mobility along SR 32 through the downtown Westfield area for both motorists and pedestrians. Therefore, this alternative is not being carried forward for further investigation. Although this suggested alternative is not being carried forward, the project team appreciates the Indiana SHPO’s suggestion.

The Indiana SHPO provided additional comments and questions in its letter of July 16, 2019:

*“We understand from the minutes that the Jersey Street Extension is proposed to be locally funded, without state or federal financial assistance. Because that project would connect Jersey with Main Street (SR 32) at about East Street, the extension project would appear to provide part of the alignment of Alternative C in this project, i.e., the one-way pairing of Main and Jersey. What would be the anticipated benefit of extending Jersey and connecting it with Main at East, if Jersey were not also connected with Main somewhere in the vicinity of Mill Street?”*

East/west mobility south of SR 32 is limited. Currently, traffic traveling east/west south of SR 32 typically utilizes the signalized Union Street intersection, further contributing to the congestion issues along SR 32. Once Grand Junction Park and Plaza and Union Square at Grand Junction (Old Town Design Group Development) are complete they will increase traffic through the area. The Jersey Street extension would provide an additional

route of direct access from the east to the southern portion of downtown Westfield including Grand Junction Park and residential houses without requiring travel along downtown SR 32.

*The SHPO staff further commented: “In May 2017 and in January 2018, our office commented on archaeological reports that were prepared for the Poplar Street Extension (Des. Nos. 1401650 and 1602088), which would begin in the vicinity of Park Street and proceed southward to 169<sup>th</sup> Street. We have been advised that that project is anticipated to receive Community Focus Grant Fund money through INDOT, and presumably that money would be matched with local funds. We surmise that the designation numbers probably were issued before it was determined that the project would use INDOT funds, instead of FHWA funds. It is our understanding that INDOT advised Westfield that it would not be necessary for Westfield to obtain a certificate of approval for that proposed use of state funding under Indiana Code 14-21-1-18. That may be true, although we have not reviewed any aspect of the Poplar Street Extension, other than what was included in the archaeological reports. Would the project area of the Poplar Street Extension overlap, or otherwise connect to, the State Road 32 Reconstruction project area? What would be the anticipated benefit of the Poplar Street Extension?”*

The project area of the Poplar Street Extension does not overlap the SR 32 Westfield Reconstruction project area. Poplar Street currently connects to SR 32, but the Poplar Street Extension would begin where Poplar Street currently terminates at Park Street and extend south.

In order to fully respond to all comments posed by consulting parties following the distribution of the Historic Property Report (September 5, 2019), a comment response form was compiled. The comment response form along with supporting figures and attachments are available for review in IN SCOPE at <http://erms.indot.in.gov/Section106Documents/> (the Des. No. is the most efficient search term, once in IN SCOPE). If you prefer a hard copy of this material, please respond to this email with your request within seven (7) days.

In response to consulting party comments, the project historians conducted additional research on the Stultz-Stanley House (WA 9) at 209 West Main Street to assess its eligibility under Criteria A, B, and C. The comment response form includes the additional analysis of NRHP eligibility property. Following the additional analysis, the project historians and INDOT/FHWA continued to believe that the house would not be eligible for listing in the NRHP.

At the same time that project team was conducting its additional analysis, the staff of the Indiana Department of Natural Resources (IDNR), Division of Historic Preservation and Archaeology (DHPA) visited the Stultz-Stanley House on December 3, 2019, and assessed its eligibility. In a formal comment dated January 6, 2020, prepared at the request of INDOT, the SHPO stated its opinion that the Stultz-Stanley House is eligible for the NRHP under Criterion C.

In light of the formal comment received from the SHPO, INDOT and FHWA will treat the Stultz-Stanley House as eligible for listing in the NRHP under Criterion C.

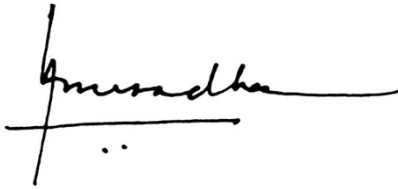
For questions concerning specific project details, you may contact Sarah Everhart of American Structurepoint, Inc. at (317) 547-5580 or [severhart@structurepoint.com](mailto:severhart@structurepoint.com). All future responses regarding the proposed project should be forwarded to American Structurepoint, Inc. at the following address:



Sarah J. Everhart  
Environmental Specialist  
American Structurepoint, Inc.  
9025 River Road, Suite 200  
Indianapolis, IN 46240  
Email: severhart@structurepoint.com  
Phone: (317) 547-5580

Tribal contacts may contact Shaun Miller at [smiller@indot.in.gov](mailto:smiller@indot.in.gov) or 317-233-6795 or Michelle Allen at FHWA at [michelle.allen@dot.gov](mailto:michelle.allen@dot.gov) or 317-226-7344.

Sincerely,

A handwritten signature in black ink, appearing to read "Anuradha", with a horizontal line underneath and two dots below the line.

Anuradha V. Kumar, Manager  
Cultural Resources Office  
Environmental Services

Enclosures:

Appendix A. Comment Response Form (with figures)  
Appendix B. Westfield Historic District NRHP Nomination  
Appendix C. INDOT Corridor Development Office Memo & City of Westfield Decommissioning Memo  
Appendix D. Westfield Preservation Alliance Petition

Distribution List:

Miami Tribe of Oklahoma  
John Carr, INDNR-DHPA  
Joshua Biggs, Indiana Landmarks Central Regional Office  
Susan Boyer, Westfield Preservation Alliance  
Mayor Andrew Cook, City of Westfield  
Judith Shuck, Property Owner  
Rebecca McGuckin, Old Town Companies  
Robert Dirks, Federal Highway Administration (FHWA)  
American Structurepoint, Inc.  
Weintraut & Associates, Inc.

# **Appendix A**

## **Comment Response Form**



Comment	Response
<p>On behalf of the Westfield Preservation Alliance, consulting party, we present our comments regarding the Historic Property Report.</p> <p style="text-align: right;"><i>Westfield Preservation Alliance, Inc.</i> October 2, 2019</p>	<p>The City of Westfield, Federal Highway Administration (FHWA)/Indiana Department of Transportation (INDOT) and their consultants wish to thank the Westfield Preservation Alliance, Inc. (WPA) for their participation in the Section 106 consultation process and for providing comments on the Historic Property Report (HPR).</p>
<p>To quote Section 106: What is an adverse effect? If a project may alter characteristics that qualify a specific property for inclusion in the National Register in a manner that would diminish the integrity of the property, that project is considered to have an adverse effect. Integrity is the ability of a property to convey its significance, based on its location, design, setting, materials, workmanship, feeling and association. (Protecting Historic Properties: A Citizen's Guide to Section 106 Review)</p> <p style="text-align: right;"><i>Westfield Preservation Alliance, Inc.</i> October 2, 2019</p>	<p>Thank you for this comment.</p> <p>Interested consulting parties may access the referenced brochure "Protecting Historic Properties: A Citizen's Guide to Section 106 Review" at <a href="https://www.achp.gov/sites/default/files/documents/2017-01/CitizenGuide.pdf">https://www.achp.gov/sites/default/files/documents/2017-01/CitizenGuide.pdf</a></p>
<p>Adverse effects to Westfield's Historic District as listed on the National Register of Historic Places which may be direct or indirect could include the following:</p> <ul style="list-style-type: none"> <li>• Physical destruction or damage</li> <li>• Relocation of the property</li> <li>• Change in the character of the property's use or setting</li> <li>• Introduction of incompatible visual, atmospheric, or audible elements</li> </ul> <p style="text-align: right;"><i>Westfield Preservation Alliance, Inc.</i> October 2, 2019</p>	<p>Adverse effects are assessed after the initiation of Section 106 and the identification of historic properties.</p> <p>The four sequential steps of the Section 106 process are:</p> <p style="margin-left: 40px;"><b>Step 1.</b> Establish the Undertaking/Initiate Section 106  <b>Step 2.</b> Identify historic properties  <b>Step 3.</b> Assess effects of the undertaking on historic properties  <b>Step 4.</b> Resolve any adverse effects</p> <p>The HPR was prepared as part of "<b>Step 2.</b> Identify historic properties." This step will also include an archaeological investigation and report.</p> <p>An alternatives analysis is being completed for this project and effects will be assessed following the completion of that report.</p>
<p>It is Westfield Preservation Alliance's understanding that the goal of the Section 106 Review is to avoid, minimize or mitigate the</p>	<p>Section 106 of the National Historic Preservation Act of 1966 requires federal agencies "take into account the effect of the undertaking on any</p>

potential destruction of buildings within Westfield's Historic District. The buildings affected by the widening of State Road 32 have not been identified nor have any solutions been offered to meet the aforementioned purpose of the review. We would appreciate a clear understanding of the impact on individual resources in any future correspondence.

*Westfield Preservation Alliance, Inc.  
October 2, 2019*

district, site, building, structure, or object that is included in or eligible for inclusion in the National Register” and to afford the Advisory Council on Historic Preservation “a reasonable opportunity to comment with regard to such undertaking” (16 U.S.C. 470f).

If a federally-funded project is determined to have an “Adverse Effect” on historic resources [i.e., resources listed in or eligible for the National Register of Historic Places(NRHP)], the federal agency will consult with the State Historic Preservation Officer (SHPO), participating Tribal Historic Preservation Officers (THPO), and consulting parties “to develop and evaluate alternatives or modification to the undertaking that could avoid, minimize or mitigate adverse effects on historic properties” [36 C.F.R. § 800.6(a)].

The SR 32 Reconstruction project is currently in the identification step of the Section 106 process.

An alternatives analysis is being completed for this project. That analysis will provide information to assess the effects of the project on historic resources (including the impacts of the project to individual properties within the Westfield Historic District).

The city of Westfield intends to demolish all historic and non-historic buildings on the south side of SR32. We have also learned that some buildings on the north side of the street may also be demolished if a roundabout is built at the intersection of SR 32 and Union Street. This would essentially destroy the buildings which are the historic context and fabric of downtown Westfield and alter forever the character of Westfield and its historic district. This has always been the main intersection of downtown Westfield with the town spreading out from that point; it was the hub of Westfield in its original plat. The old State Bank of Westfield building, Funderburgh's old grocery store, and the old Mendenhalls Drug Store have been the landmarks at the intersection of downtown Westfield for many years, and are fondly remembered by its citizens.

An alternatives analysis is being completed for this project. Information from that analysis will be used to assess the effects of the project on historic resources.



*Westfield Preservation Alliance, Inc.*  
*October 2, 2019*

In January of 1977, the Westfield Business Association submitted to the town, 'An Improvement Study for the Westfield Historical Central Business District', conducted by James Associates Architects. This wonderful book shows photos of the downtown buildings at that time, and renderings of how preservation and restoration would make them a vital part of the total downtown environment. Forty-two years ago, the city leaders realized how important it was to acknowledge and maintain the historic buildings in Westfield. "Many of the buildings in the Central Business District and the residential areas have considerable architectural significance. The Central Business District has a heavy concentration of historic buildings that vividly express the various architectural styles and periods of the nineteenth and early twentieth centuries. The intersection of Main and Union Streets continues to be the focal point of the Central Business District and the town."

Thank you for this comment.

*Westfield Preservation Alliance, Inc.*  
*October 2, 2019*

The historic buildings that have been listed on the NRHP are very noteworthy and should be preserved for the future of Westfield. In the late 19th century and early 20th century, Westfield was a very compact town centered around the intersection of what is now SR 32 and Union Street. This area was part of the Westfield Historic Site as sited in the April 1978 and March 1992 Hamilton County Interim Reports. The 1978 report states, "Westfield was platted in 1834 and settled predominantly by Quakers. Because of its location at the intersection of two early roads, the town functioned as a service area for travelers. Little remains of Westfield's early commercial district, making the cluster of houses and businesses along Main and Union Streets are especially important as tangible evidence of the town's history."

Thank you for this comment.

Westfield Preservation Alliance, Inc.  
October 2, 2019

It would not be feasible to relocate the historic district of Westfield to another site, but it is possible at this stage to choose an alternative route for SR 32 through Westfield which would not cause physical destruction to any historic building. Utilizing a one-way pair along Jersey Street from a location near the roundabout at Poplar Street to East Street and the existing roadway of SR 32 would eliminate the need to demolish any of the buildings listed on the National Register of Historic Places, as well as any other contributing buildings on Main Street. This may also prevent extensive roadway construction from occurring in front of these historic buildings which could result in damage to the buildings foundations.

An alternatives analysis is being completed for this project that will include the examination of a one-way pair option utilizing Jersey Street. Information from that analysis will be used to assess the effects of the project on historic resources.

Westfield Preservation Alliance, Inc.  
October 2, 2019

The Historic Property Report for State Road 32 Reconstruction does not describe the individual buildings which are listed in the NRHP, so we have listed those buildings which could be impacted as they appear in the federal document.

[The letter then quotes excerpts from the NRHP nomination form]

The HPR provides a description of the NRHP-listed Westfield Historic District on pages 22-24 and includes a summary of the number and type of resources within the district. This approach follows guidance for HPR preparation outlined in the INDOT *Cultural Resource Manual* as part of a “reasonable and good faith effort” to identify and evaluate historic resources [36 CFR § 800.4(b)(1)].

Westfield Preservation Alliance, Inc.  
October 2, 2019

According to the National Park Service (NPS), a historic district “is itself a historic resource” that represents “a coherent whole” and “each resource included within the boundary of a district is part of the National Register listing, not as an individual property, but as part of the grouping or the historic environment that constitutes the district.”<sup>1</sup> The HPR description of the district as a “coherent whole” is consistent with the NPS definition of a historic district.

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<sup>1</sup> Patrick W. Andrus et al, “Manual for State Historic Preservation Review Boards,” (Washington, D.C.: U.S. Department of the Interior, National Park Service, Interagency Resources Division, 1992), 30.



The complete Westfield Historic District NRHP nomination form and comments from the WPA and other consulting parties may be found in IN SCOPE at <http://erms.indot.in.gov/Section106Documents/> (the Des. No. is the most efficient search term, once in IN SCOPE).

The SR 32 Reconstruction project is currently in the identification step of the Section 106 process.

An alternatives analysis is being completed for this project. That analysis will provide information to assess the effects of the project on historic resources (including the impacts of the project to individual properties that contribute to the Westfield Historic District).

At this time, WPA respectfully requests a meeting of the consulting parties be commenced before any further progress is made on the project. We are also concerned that the maps for this project keep changing without explanation. Additionally, we have included a petition, signed by 313 individuals who are interested in preservation of the character of Westfield's historic downtown district. The signors are predominantly from our community and their comments have been included for your convenience.

*Westfield Preservation Alliance, Inc.  
October 2, 2019*

A consulting parties meeting will be held to discuss the alternatives analysis sometime after the first of the year (2020); consulting parties will be notified once a date has been set.

The petition included with the WPA comments is available for review on INSCOPE at IN SCOPE at <http://erms.indot.in.gov/Section106Documents/> (the Des. No. is the most efficient search term, once in IN SCOPE).

The project team notes that this petition appears to be in response to one or more "public-private partnership" projects. While this federally-funded project is not affiliated with a public-private partnership, the project team appreciates being provided with the petition and the comments from the signatories.

Thank you for the Historic Property report. I do have some comments and questions regarding the content.

*Judith Stanley Shuck  
October 2, 2019*

The City of Westfield, FHWA/INDOT and their consultants wish to thank Ms. Shuck for participating in the Section 106 consultation process and for providing comments on the HPR.

In addition, project historians wish to thank Ms. Shuck for allowing them to conduct a site survey of her home and for providing information about the house and its history.

---

I understand the goal of the Section 106 Review is to avoid, minimize or mitigate the potential destruction of present buildings.

*Judith Stanley Shuck  
October 2, 2019*

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies “take into account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register” and to afford the Advisory Council on Historic Preservation “a reasonable opportunity to comment with regard to such undertaking.” (16 U.S.C. 470f)

If a federally-funded project is determined to have an “Adverse Effect” on historic resources (i.e., resources listed in or eligible for the NRHP), the federal agency will consult with the SHPO, participating Tribal Historic THPO, and consulting parties “to develop and evaluate alternatives or modification to the undertaking that could avoid, minimize or mitigate adverse effects on historic properties” [36 C.F.R. § 800.6(a)].

The SR 32 Reconstruction project is currently in the identification step of the Section 106 process.

An alternatives analysis is being completed for this project. That analysis will provide information to assess the effects of the project on historic resources.

I would appreciate a clearer description of our property and what adverse effects this will have on our lives

First, this does have an adverse effect on our home at 209 West Main Street, Westfield, IN. For 67+ years this house has been our home. My parents, Allan & Lillian Stanley, my great aunt, Helen Estes, my five children and two great grandchildren have called this HOME.

*Judith Stanley Shuck  
October 2, 2019*

The project is currently in the identification and evaluation phase. Once a preferred alternative has been selected, the effects of the undertaking on historic properties will be discussed. Historic properties are those listed in, or eligible for listing in, the NRHP. We will not be assessing effects until the identifications and evaluation phase is completed.

Second, the report listed the description being a one and one-half story house. I question this because all of the years any property tax assessment has listed it as a two story. It also states that it is on a concrete foundation. What does that mean because it has a

The term “half story” refers to a partial height second floor, in this case evidenced by the gabled dormer on this home’s façade; this is an architectural term, not a term used for a tax assessment. (Note, for example, the letter dated January 6, 2020, in which SHPO also describes



basement? The architecture of the home still maintains the 1800's with the side entryway with the transom, the stairway and in the basement the double brick wall and hand hewn beams. While the first floor features of the craftsman style with the brick fireplace and full room width mantel and built in bookcases with French doors.

*Judith Stanley Shuck  
October 2, 2019*

Third, in the recommendation of this house, research did not find a specific, direct correlation with "events that have made a significant contribution to the broad patterns of our history." The contribution of it being here at the same location in Westfield is contribution to the historical landscape of this community.

*Judith Stanley Shuck  
October 2, 2019*

this "one-and-a-half story house with overhanging roof" as one of the "key traits of the bungalow type.")

Architectural descriptions/surveys do not usually consider the basement—which also serves as the foundation for this house—as a "story." It is possible that the definition of "story" for this architectural description varies from that of a county tax assessor.

The project team also agrees that the house includes the features from the 19<sup>th</sup> and 20<sup>th</sup> century that Ms. Shuck describes.

Historians used the guidance in the National Register Bulletin "How to Apply the National Register Criteria for Evaluation" to examine the house for eligibility.<sup>2</sup>

For a property to eligible for listing in the NRHP, it must be possess significance under one or more of the National Register Criteria for Evaluation.

Properties may be considered eligible under Criterion A, which is the Criterion Ms. Shuck quotes in this comment, if they demonstrate a significant linkage to historic events and retain historic integrity.

Properties are significant under Criterion A if they are "associated with events that have made a significant contribution to the broad patterns of our history."<sup>3</sup>

Through their research—including a site visit to the house, conversations with the property owner, and documentary research—historians found this house was associated the history and development of Westfield (Community Planning & Development).

Next, historians examined the significance of that association. According the NRHP: "Mere association with historic events or trends is not

<sup>7</sup> Andrus et al, "Manual for State Historic Preservation Review Boards," 30.

<sup>7</sup> Andrus et al, "Manual for State Historic Preservation Review Boards," 30.

enough, in and of itself, to qualify under Criterion A: the property's specific association must be considered important as well. For example, a building historically in commercial use must be shown to have been significant in commercial history.”<sup>4</sup>

This property is associated with the history and development of Westfield; however, historians were unable to find supporting evidence that the house was significant **to** the history and development of Westfield. The house was not recommended eligible under Criterion A.

In response to consulting party comments, the project historians conducted additional research on the Stultz-Stanley House to assess its eligibility under Criteria A, B, and C. That analysis is described in the responses below. Following the additional analysis, the project historians and INDOT/FHWA continued to believe that the house would not be eligible for listing in the NRHP.

At the same time that project team was conducting its additional analysis, the staff of the Indiana Department of Natural Resources (IDNR), Division of Historic Preservation and Archaeology (DHPA) visited the Stultz-Stanley House on December 3, 2019, and assessed its eligibility. In a formal comment dated January 6, 2020, prepared at the request of INDOT, the SHPO stated its opinion that the Stultz-Stanley House is eligible for the NRHP under Criterion C.

In light of the formal comment received from the SHPO, INDOT and FHWA will treat the Stultz-Stanley House as eligible for listing in the NRHP under Criterion C.

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<sup>7</sup> Andrus et al, “Manual for State Historic Preservation Review Boards,” 30.



It was also stated that it does not appear to rise to the level of known associations with “the lives of persons significant in our past”. Contributors to the history of Westfield are owners Hubert and Martha Horton, parents to Marl Horton (owner of Horton’s Meat Market) father of Mary Green, “our Westfield pg. 38”. Mr. Larkin Stultz (owner of Stultz garage) father of Glen Stultz also owners. And Allan Stanley great grandson of Lewis and Huldah Estes (first professors of Union High on South Union Street and Lewis as the first president of the Westfield Bank, and Huldah being known as an abolitionist), grandson of Irvin and Ruth Stanley, (professors at Union High). Irvin was also the photographer for the transit of Venus in the 1800’s. Mr. Stanley was a descendant of Mayflower pilgrims John and Priscilla Alden. Mr. Stanley served on the Westfield Town Council for 4 years and the Westfield Washington school board for 16 years. The former football stadium was named “Stanley Stadium” in his memory. There is a plaque at the new stadium at Westfield High School identifying Mr. Stanley. The Stanley family being relatives to Katherine Coffin, wife of Levi Coffin, president of the Underground Railroad. All of the listed owners and residents of this house contributed great significance to the history of Westfield

*Judith Stanley Shuck  
October 2, 2019*

Historians used the guidance in the National Register Bulletin “How to Apply the National Register Criteria for Evaluation” to examine the house for eligibility.

For a property to eligible for listing in the NRHP, it must be possess significance under one or more of the National Register Criteria for Evaluation.

Properties may be considered eligible under Criterion B, which is the Criterion Ms. Shuck quotes in this comment, “if they are associated with the lives of persons significant in our past.”<sup>5</sup>

The first step in establishing a connection under Criterion B is to “determine the importance of the individual.”<sup>6</sup>

Historians consulted obituaries and newspaper articles to research individuals listed in the comment:

“Hubert and Martha Horton, parents to Marl Horton (owner of Horton’s Meat Market) father of Mary Green, ‘our Westfield pg. 38’.”

- **Hubert Horton (d. 1907)** – Hamilton County auctioneer
- **Marl Horton** – Owner of Horton’s Meat Market
- **Mary Horton Greene (1904-1999)** was the Westfield post mistress for 31.5 years, a barber, and a chiropractor
- Historians were unable in their research to distinguish these family members in a significant way from other community members by their occupations or the activities in which they were involved.

“Mr. Larkin Stultz (owner of Stultz garage) father of Glen Stultz also owners.”

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<sup>7</sup> Andrus et al, “Manual for State Historic Preservation Review Boards,” 30.

<sup>7</sup> Andrus et al, “Manual for State Historic Preservation Review Boards,” 30.

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- **Larkin Stultz** (1858-1931) – A three-term county commissioner. Mr. Stultz may have been responsible for the remodel of the house sometime after he purchased it in 1924.
  - **Glen Stultz** (about 1888-1946) – a county commissioner; worked at Stultz garage
  - Historians were unable in their research to distinguish Mr. Larkin Stultz and Mr. Glen Stultz in a significant way from other community members and civic leaders by the offices or activities in which they were involved.

“Allan Stanley great grandson of Lewis and Huldah Estes (first professors of Union High on South Union Street and Lewis as the first president of the Westfield Bank, and Huldah being known as an abolitionist), grandson of Irvin and Ruth Stanley, (professors at Union High). Irvin was also the photographer for the transit of Venus in the 1800's. Mr. Stanley was a descendant of Mayflower pilgrims John and Priscilla Alden. Mr. Stanley served on the Westfield Town Council for 4 years and the Westfield Washington school board for 16 years. The former football stadium was named “Stanley Stadium” in his memory. There is a plaque at the new stadium at Westfield High School identifying Mr. Stanley.”

- Historians examined the property for significance in connection with **Allan “Red” Stanley** (1914-1991). Please note that for this property to be eligible under Criterion B, significance would need to be connected with a resident of the house and not the resident's relatives.
  - Mr. Stanley was a graduate of Westfield High School (WHS) (1932).
  - Mr. Stanley was quarterback for the WHS football team and co-founded the Letterman Club.
  - After graduation, Mr. Stanley officiated football and basketball games for WHS and served as a coach for little league and Babe Ruth baseball.
  - Mr. Stanley was a member of the Westfield Town Board for four years, Westfield fire chief for two years, and member of the Westfield School Board for 16 years.
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- Mr. Stanley contributed to the construction of the WHS football field by coordinating the purchase and donation of the land to the school district in his role as co-founder of the Letterman Club.
  - Mr. Stanley was a member of the Westfield Friends Church.
  - Documentary research suggests Mr. Stanley was an active and respected member of the Westfield community; however, historians were unable in their research to distinguish Mr. Stanley in a significant way from other community and civic leaders in Westfield by the offices he held or activities in which he participated.

“The Stanley family being relatives to Katherine Coffin, wife of Levi Coffin, president of the Underground Railroad. All of the listed owners and residents of this house contributed great significance to the history of Westfield.”

- For this property to be eligible under Criterion B, the significant achievements in connection to the Underground Railroad would need to have been accomplished by a resident of this house, not by one of their relatives.

Following this research, the project historians do not believe the Stultz-Stanley House is eligible for listing in the NRHP under Criterion B.

Staff of the IDNR, DHPA visited the Stultz-Stanley House on December 3, 2019, and assessed its eligibility. In a formal comment dated January 6, 2020, the SHPO stated its opinion that the Stultz-Stanley House is eligible for the NRHP under Criterion C.

Therefore, for the purposes of this Section 106 undertaking, the Stultz-Stanley is considered eligible for the NRHP under Criterion C.

My husband Robert and I have taken care of the property and kept it to the best historical charm that it brings to our family and this community. We also contribute to the history of Westfield by our volunteer work in the community. There is not another bungalow in the Westfield community or Hamilton County with

In a formal comment dated January 6, 2020, the SHPO stated its opinion that the Stultz-Stanley House is eligible for the NRHP under Criterion C; therefore, for the purposes of this Section 106 undertaking, the Stultz-Stanley is considered eligible for the NRHP under Criterion C.

the history and charm this house provides. It is well over 100 years old, the garage was added in the 1950's. You cannot build anything like it today.

*Judith Stanley Shuck*  
October 2, 2019

At this time I request a meeting of the consulting parties be brought forward before any further progress is made on the project.

A consulting parties meeting will be held to discuss the alternatives analysis sometime after the first of the year (2020); consulting parties will be notified once a date has been set.

*Judith Stanley Shuck*  
October 2, 2019

We have reviewed the Historic Property Report for Des. No. 1801731.

*Indiana Landmarks*  
October 7, 2019

The City of Westfield, FHWA/ INDOT and their consultants wish to thank Indiana Landmarks for participating in the Section 106 consultation process and providing comments on the HPR.

As Westfield's only neighborhood or district on the National Register of Historic Places, we believe that the HPR needs to delve into greater detail about each specific historic resource within the historic district, and to discuss how these resources may be adversely affected by the reconstruction of State Road 32. The Westfield Historic District is not just one singular resource, but a grouping of many contributing historic resources that make up a greater whole.

*Indiana Landmarks*  
October 7, 2019

There are two NRHP-listed districts in the City of Westfield: Westfield Historic District (NR-2521) and Union High Academy Historic District (NR-1241).

The HPR provides a description of the NRHP-listed Westfield Historic District on pages 22-24 and includes a summary of the number and type of resources within the district. This approach follows guidance for HPR preparation outlined in the INDOT *Cultural Resource Manual* as part of a "reasonable and good faith effort" to identify and evaluate historic resources [36 CFR § 800.4(b)(1)].

According to the NPS, a historic district "is itself a historic resource" that represents "a coherent whole" and "each resource included within the boundary of a district is part of the National Register listing, not as an individual property, but as part of the grouping or the historic environment that constitutes the district."<sup>7</sup> The HPR description of the

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<sup>7</sup> Andrus et al, "Manual for State Historic Preservation Review Boards," 30.



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district as a “coherent whole” is consistent with the NPS definition of a historic district.

The SR 32 Reconstruction project is currently in the identification step of the Section 106 process.

An alternatives analysis is being completed for this project. That analysis will provide information to assess the effects of the project on historic resources (including the impacts of the project to individual properties that contribute to the Westfield Historic District).

We concur with the HPR that the Westfield Historic District is the only National Register district within the Area of Potential Effect (APE). We also agree with the HPR that the Dr. Julius L. Benson House (IHSSI #057-464-26015) is eligible for the National Register of Historic Places under Criterion C.

*Indiana Landmarks  
October 7, 2019*

We also request that further research efforts be taken to determine if the Stultz-Stanley House at 209 West Main Street would be eligible for the National Register of Historic Places under Criterion A and/or C. Though the current structure resembles an early 20th century Craftsman-style bungalow, the house was originally constructed ca. 1860s, and a number of interior 19th century elements remain intact to date. The house is directly tied with early Quaker settlement and development in the early years of the city's history.

*Indiana Landmarks  
October 7, 2019*

Thank you for this comment.

**Criterion A**

Historians used the guidance in the National Register Bulletin “How to Apply the National Register Criteria for Evaluation” to examine the house for eligibility.

For a property to be eligible for listing in the NRHP, it must possess significance under one or more of the National Register Criteria for Evaluation.

Properties are significant under Criterion A if they are “associated with events that have made a significant contribution to the broad patterns of our history.”<sup>8</sup>

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<sup>8</sup> “How to Apply the National Register Criteria for Evaluation,” p. 12.

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Through their research—including a site visit to the house, conversations with the property owner, and documentary research—historians found this house was associated the history and development of Westfield (Community Planning & Development).

During the site visit and in reviewing aerial photographs, historians found that the broader setting of the house has been altered by the demolition of surrounding residential properties (See Attachment); however, historians believed the house itself conveyed enough association to merit further study even with these losses to the broader setting.

Therefore, the historians next examined the significance of the house's association with the history and development of Westfield. According the NRHP: "Mere association with historic events or trends is not enough, in and of itself, to qualify under Criterion A: the property's specific association must be considered important as well. For example, a building historically in commercial use must be shown to have been significant in commercial history."<sup>9</sup>

This property is associated with the history and development of Westfield; however, historians were unable to find supporting evidence that the house was significant **to** the history and development of Westfield. The house was not recommended eligible under Criterion A.

### **Criterion C**

Properties are significant under Criterion C if they:

- "Embody distinctive characteristics of a type, period, or method of construction.
- Represent the work of a master.
- Possess high artistic value.
- Represent a significant and distinguishable entity whose components may lack individual distinction."

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<sup>9</sup> "How to Apply the National Register Criteria for Evaluation," p. 12.



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Historians examined the building for significance as embodying the distinctive characteristics of a 19th Century Gable-front house or an early 20th century Bungalow in Westfield and Washington Township.

Based on their site visit to the house, historians believe the property was originally a Gable-front residence, with a window-door-window or a door-window-window first-floor configuration and a single window in the upper front gable, similar to the Contributing House at 116 North Union Street in the Westfield Historic District (IHSSI No.: 057-667-26021). Interior features from the core of the original house, including a stairway and door moldings, are similar to the mass-produced millwork styles that became available by catalog and shipped by the railroad in the late nineteenth century.<sup>10</sup>

The Stultz-Stanley House no longer conveys the essential characteristics of the Gable-front style, including the gable front façade entry and fenestration pattern.<sup>11</sup> There are two properties near the Stultz-Stanley House that are more intact examples of the Gable-front style (See Attachment):

- IHSSI No.: 057-667-26021, House, 116 North Union Street (Rated “Contributing” in the IHSSI and a Contributing resource to the Westfield Historic District)
- IHSSI No.: 057-667-26028, House, 323 South Union Street (Rated “Contributing” in the IHSSI; south of the Westfield Historic District and south of the APE).

Historians also examined the building as an expression of a Craftsman/Bungalow. The *Hamilton County Interim Report* notes that the bungalow enjoyed “unprecedented ubiquity” in the United States for its “suitability to the burgeoning middle class in America’s urban and suburban areas; it was inexpensive, fashionable, and generally of modest

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<sup>10</sup> For example: in E. L. Roberts & Co., *Roberts’ Illustrated Millwork Catalog: A Sourcebook of Turn-of-the-Century Architectural Woodwork* (New York: Dover Publications, Inc., 1988, reprint of 1903 original).

<sup>12</sup> *Hamilton County Interim Report*, xx-xxx.

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scale.”<sup>12</sup> As noted in the HPR, typical details of this ubiquitous property type “include the use of natural materials, low-pitched roofs with wide exposed eaves and framing materials, porches with distinctive supports and railings, prominent chimneys, dormers, and windows with multi-pane upper sashes, often grouped in twos and threes.” The exterior of the Stultz-Stanley House demonstrates many of these characteristics.

Next, following the NRHP evaluation guidance, historians compared this property to other examples of Bungalows in the surrounding area. There are five properties near the Stultz-Stanley house that are located along the “historic crossroads” of Main (SR 32) and Union that are either identified in the IHSSI and/or within the boundaries of the Westfield Historic District:

- IHSSI No.: 057-667-26003, House, 345 North Union Street (Rated “Contributing” in the IHSSI and a Contributing resource to the Westfield Historic District, north of project APE)
- IHSSI No.: 057-667-26024, Westfield Carnegie Library, West Main Street (Rated “Notable” in the IHSSI and a Contributing resource to the Westfield Historic District)
- 136 East Main Street (Craftsman, Contributing to the Westfield Historic District)
- 139 North Union Street (Bungalow/Craftsman, Contributing to the Westfield Historic District)
- 336 Penn Street (Craftsman, WA 2 within project APE)

The Houses at 345 North Union Street (IHSSI No.: 057-667-26003) and 327 South Union Street appear to be particularly intact expressions of the Bungalow that lack the modern alterations seen in other properties, including the Stultz-Stanley House which has a twentieth century rear ell and garage addition (See Attachment).

Based on this research and survey, historians did not believe Stultz-Stanley House represented “the sole example of a property type that is important in illustrating the historic context” in the area of Architecture

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<sup>12</sup> *Hamilton County Interim Report, xx-xxx.*



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nor does is “clearly express the defined characteristics required to be strongly representative of the context” of Architecture in comparison to similar resources in the vicinity.<sup>13</sup> Therefore, the house was not recommended eligible under Criterion C. However, the staff of IDNR-DHPA conducted a separate review.

The staff of the IDNR-DHPA conducted a site visit to the house on December 3, 2019 and offered a formal statement of eligibility in a letter dated January 6, 2020.

SHPO did not address the eligibility of the house under Criteria A or B; however, in contrast to the recommendations of the HPR, SHPO stated the Stultz-Stanley House is eligible for listing in the NRHP under Criterion C for its Craftsman architecture.

In its formal letter, SHPO stated the house has “all the key traits of the bungalow type. . .” and noted “[t]he interior also reveals a twist on the Craftsman style: The homeowners elected to build their bungalow around an existing house. Family lore, and physical evidence, show that the house was originally a late Greek Revival/Italianate house that was oriented so that the current west elevation faced Main Street.”

SHPO stated that “[r]euse of an existing house was not incompatible with the modern simplicity of the Craftsman movement. . .” and noted that locally, the “*Indianapolis Star* published articles in their home building section on the subject in the 1900-1940 period.” SHPO concluded, “The general idea of saving and updating a house was part and parcel of the Craftsman era, including Central Indiana, and the Stultz-Stanley House is solid example.”

Therefore, for the purposes of this Section 106 undertaking, the Stultz-Stanley is considered eligible for the NRHP under Criterion C for its architectural significance, per the SHPO’s letter.

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<sup>13</sup> “How to Apply the National Register Criteria for Evaluation,” 9.

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Indiana Landmarks is concerned that many historic resources in the Westfield Historic District (which also are located within the Area of Potential Effect) may be at great risk for demolition due to the scope of this project. We have heard from and have met with many concerned local residents about the project, and we share their concerns.

*Indiana Landmarks  
October 7, 2019*

We believe that demolition of contributing resources in the Westfield Historic District will have a substantial adverse effect on the quality of life, economic vitality, and irreplaceable character of Westfield. This may set a dangerous precedent where other buildings may be demolished in the future by other parties. Demolition of historic property downtown would cause Westfield to lose its historic identity and sense of “place.”

*Indiana Landmarks  
October 7, 2019*

As Westfield continues to grow at its rapid pace, it will be imperative for the city to maintain its character, authenticity, and tangible reminders of its rich history. Having a vibrant, walkable, and historic downtown benefits everyone. Losing two corner historic buildings on Westfield’s “Main & Main” would all but eradicate much of the historic context relating to Westfield’s growth and development.

We believe that alternative plans can and should be explored. We would ask that American Structurepoint hold a follow-up consulting parties meeting, where historic resources within the Westfield Historic District can be discussed in greater detail, and alternatives can be explored. Indiana Landmarks representatives will be interested in attending this meeting. We propose that, if feasible, that greater consideration is given to routing westbound

This comment has been forwarded to project designers. An alternatives analysis is being completed for this project. Information from that analysis will be used to assess the effects of this project on historic resources.

A consulting parties meeting will be held after the first of the year (2020) and consulting parties will be notified once a date has been set.

An alternatives analysis is being completed for this project. Information from that analysis will be used to assess the effects of the project on historic resources.

The purpose of this project is to improve corridor mobility along SR 32 through the downtown Westfield area for both motorists and pedestrians.

The project team recognizes that the intersection of Main and Union Streets was important to the development of Westfield and recognizes that this intersection and the surrounding buildings have been included in the NRHP-listed Westfield Historic District.

An alternatives analysis is being completed for this project. In addition, a consulting parties meeting will be held sometime after the first of the year (2020) and consulting parties will be notified once a date has been set.



traffic one-way on Highway 32, and eastbound traffic be diverted one-way onto Jersey Street, through the downtown area.

*Indiana Landmarks  
October 7, 2019*

It is our hope that project leaders will seek ways to avoid, minimize, or mitigate any adverse effects on historic properties in downtown Westfield.

An alternatives analysis is being completed for this project. In addition, a consulting parties meeting will be held sometime after the first of the year (2020) and consulting parties will be notified once a date has been set.

*Indiana Landmarks  
October 7, 2019*

The area of potential effects ("APE") proposed in the historic property report ("HPR") is probably of adequate size to encompass the geographic area in which the three "project alternatives being considered at this time," as INDOT's September 5 letter refers to them.

Thank you for this comment.

The City of Westfield, FHWA/INDOT and their consultants wish to thank the Deputy SHPO for participating in the Section 106 consultation process and providing comments on the HPR.

*Deputy State Historic Preservation Officer  
October 7, 2019*

As you know, however, in our June 12, 2019, letter, we proposed another alternative that would involve directing drivers who otherwise would leave Noblesville heading west on SR 32 to access the interchange with US 31 just west of downtown Westfield to take, instead, SR 38 toward the northwest or SR 37 or I-69 toward the south. Improvements to the existing SR 32 and its sidewalks and other infrastructure might still be in order, but perhaps extensive right-of-way acquisition through Westfield could be avoided. At the May 20, 2019, consulting parties meeting, we heard that one of the other consulting parties was planning to present an alternative to the three described there. It is possible that any of the consulting party-proposed alternatives, if deemed worthy of further study, could require a revision to the APE proposed in the HPR. If any consulting party-proposed alternative is not deemed worthy of further study, we ask that you explain in future correspondence why it is not worthy.

A memo from the INDOT Corridor Development Office states that an alternative that decommissions SR 32 and redirects truck traffic is not reasonable or feasible: According to the memo, "...the interchange of US 31 and SR 32 forms a major connection point via the US 31 freeway to I-465 at the west end of the SR 32 corridor. Traffic data shows that US 31 at SR 32 is a destination point in addition to downtown Westfield itself. Of great significance is the fact that INDOT and FHWA invested millions of dollars into the US 31 Hamilton County freeway and the interchange at SR 32 to provide improved safety and traffic operations, access, connectivity and increased opportunities for economic development. Disallowing the traveling public from using SR 32 via a road transfer or any other means would call into question the prior investment and the environmental study on which the US 31 freeway was founded...Even if such an agreement were to be reach and truck traffic routed on another road, the high passenger car traffic volumes would still use the corridor as it is the shortest path to the US 31 freeway..." Decommissioning SR 32

*Deputy State Historic Preservation Officer  
October 7, 2019*

would not address the need of the project, to provide an efficient traveling environment for motorists or pedestrians, as the existing roadway is congested, nor does it address the purpose of the project, to improve corridor mobility along SR 32 through the downtown Westfield area for both motorists and pedestrians. Therefore, this alternative is not being investigated further.

In a meeting with project representatives on August 20, 2019, Ms. Judith Shuck proposed an alternative to maintain the existing typical roadway section of SR 32 by removing vehicle access to Union Street (north and south) from SR 32. This alternative would be along the same alignment as Alternate A (widening of SR 32) and therefore, would not require a revision to the APE proposed in the HPR. This alternative is currently being evaluated as part of the alternative analysis. If additional alternatives are proposed and merit further study, the APE would be re-evaluated. The project team has prepared this comment/response form to address consulting party comments and questions.

We have a couple of questions about the APE as it has been proposed to date, which we also ask that you answer in future correspondence.

*Deputy State Historic Preservation Officer  
October 7, 2019*

First, the proposed APE generally follows the alignments of the three alternatives. However, it extends northward for about two city blocks along North East Street, into an area where none of the three alternatives seemingly would extend. What is the purpose of that extension?

*Deputy State Historic Preservation Officer  
October 7, 2019*

The purpose of this extension in the APE is due to the intersection improvements that are proposed at East Street for each of the alternatives and the modifications needed along East Street to tie into Penn Street (Alternative B - SR 32 One-Way Pair using Penn Street). In addition, existing East Street has a tight S-curve north of Penn Street where the speed limit reduces to 15 mph and has limited sight distances. Depending on the recommended alternative, that existing S-curve would either be reconstructed to tie-in with Penn Street or the S-curve would be corrected to address the limited sight distance concerns.

Second, the proposed APE includes the alignment of the East Street Extension, which the consulting parties were told was an entirely locally-funded project. We do not object to the East Street Extension's being included in the APE for the SR 32 Westfield Reconstruction, because that extension would provide

The project team interprets the reference to the "East Street Extension" as intended to refer to the Jersey Street Extension. If Alternative C, SR 32 One-Way Pair using Jersey Street, was the recommended alternative then the extension of Jersey Street would be part of the federal undertaking. Therefore, the Jersey Street Extension corridor, which overlaps with



what seems to be an essential part of the eastern half of one of the three alternatives and presumably would be constructed simultaneously with, or close in time to, the SR 32 project. Has FHWA determined that the East Street Extension, for Section 106 purposes, is part of the federal undertaking being reviewed here as the SR 32 Westfield Reconstruction?

*Deputy State Historic Preservation Officer  
October 7, 2019*

We agree with the HPR's conclusion that the National Register of Historic Places ("NRHP") listed Westfield Historic District remains eligible for the NRHP and that it is the only NRHP-listed property within the APE.

Although the bridge on Union Street over Grassy Creek (Hamilton County Bridge No. 29-00612; NBI No. 2900214) was determined not to be individually eligible for the NRHP by the Indiana Historic Bridge Inventory, the HPR correctly identifies it as a structure that contributes to the Westfield Historic District, according to the NRHP nomination.

We agree, for the purposes of the Section 106 review of this federal undertaking, that the Dr. Julius L. Benson House (IHSSI No. 057-464-26015) at 550 East Main Street is eligible for the NRHP under Criterion C, although we do not know to what extent it retains its interior integrity.

*Deputy State Historic Preservation Officer  
October 7, 2019*

We are uncertain at this time about the NRHP eligibility of the Stultz-Stanley House (WA 9) at 209 West Main Street. The HPR describes various interior features of the house, but we have not found any interior photographs in the HPR. If Weintraut and Associates—or whoever else was given access to the interior—took interior photographs, could you please provide them to us and the other consulting parties?

Alternative C, is included in the current APE and Section 106 evaluation. If the recommended alternative does not utilize the proposed Jersey Street Extension, then the Jersey Street Extension project will continue as a locally funded project and not be evaluated as part of the federal undertaking.

Thank you for these comments regarding the identification and evaluation of historic resources.

As noted above, the SHPO has provided an opinion that Stultz-Stanley House is eligible under Criterion C for Architecture; therefore, this property is considered eligible for the NRHP for the purposes of this Section 106 undertaking.

*Deputy State Historic Preservation Officer  
October 7, 2019*

Regarding the three recent past housing additions platted along Main Street or North East Street (Sycamore Addition, Roberts Rolling Acres, and Newby's Westfield Heights), based on available information, we agree with the ultimate conclusion of the HPR that those additions do not appear to be eligible for the NRHP. However, we do not agree with the rationale that Westfield's post-war development in those additions necessarily does not fit the paradigm established in the "Residential Planning and Development in Indiana, 1940-1973" Multiple Property Documentation Form. We expect that districts of this type may be eligible elsewhere.

Project historians have noted the SHPO's objection to the rationale for recent past properties.

*Deputy State Historic Preservation Officer  
October 7, 2019*

We agree that none of the other properties identified within the APE by the HPR are eligible for the NRHP.

Thank you for these comments regarding the identification and evaluation of historic resources.

*Deputy State Historic Preservation Officer  
October 7, 2019*

It is our understanding from the consulting party letter that an archaeological survey will be conducted and a report of the investigation will be forthcoming. Once the indicated information is received, the Indiana SHPO will resume identification and evaluation procedures for this project. Please keep in mind that additional information may be requested in the future.

This understanding is correct regarding the archaeology survey.

*Deputy State Historic Preservation Officer  
October 7, 2019*

Have you received any comments or questions recently on the HPR from Judith Stanley Shuck (grammiejrshuck@comcast.net), owner of 209 West Main? Earlier this week, after she had received an e-mailed copy of our Oct. 7 letter, she e-mailed me to let me know she's a consulting party, even though we had

The Julius Benson was recommended eligible because it is a rare example of a Gothic Revival house in Washington Township. It was noted in the *Hamilton County Interim Report* as "one of the finest residential examples of the Gothic Revival" style in Hamilton County. This style is typically rarer than the "ubiquitous" Bungalow. At the time of the IHSSI survey, there



(inadvertently) left her name of the list of emc recipients at the end of our letter. More importantly, Ms. Shuck expressed uncertainty about why the Benson House was found to be NRHP-eligible but hers was not, and she said she has lots of questions about the HPR.

*Team Leader for Historic Structures Review  
Division of Historic Preservation and Archaeology  
Email to Structurepoint  
October 11, 2019*

were 37 Gothic Revivals in Hamilton County compared to 56 Bungalow/Craftsman.

Historians conducted a site review of the Gothic Revival-style residences in Washington Township and did not identify a home that possessed more integrity than the Benson House even though it includes a rear addition. The Benson House retains a character-defining central arch and elaborate tracery (See Attachment).

In comparison, there are several more intact examples of 19<sup>th</sup> century Gable front buildings in the area that have not been altered to the extent of the Stultz-Stanley House. There are also more examples of the Bungalow/Craftsman style in the immediate vicinity of the Stultz-Stanley house including two that Contribute to the Westfield Historic District and two that do not have rear additions, based on a survey from the public right-of-way.

As noted above, the SHPO stated its opinion that Stultz-Stanley House is eligible under Criterion C for Architecture; therefore, this property is considered eligible for the NRHP for the purposes of this Section 106 undertaking.

#### COMMENT RESPONSE FORM ATTACHMENTS:

- Aerial Photographs Showing Stultz-Stanley House (1958-2019)
- Gable-front Properties in the vicinity of Main Street (State Road 32) and Union Street
- Craftsman/Bungalow Properties in the vicinity of Main Street (State Road 32) and Union Street
- Gothic Revival Architecture in Washington Township



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## MEETING MINUTES

**Location:** Virtual Meeting (Zoom)

**Date:** June 4, 2020

**Project Name:** State Road 32 Reconstruction (Des. No. 1801731)

**Project No.:** 2018.01349

**Consulting Party** Briana Hope, Sarah Everhart, Ken Olson, Tanner McKinney (American Structurepoint, Inc.)  
**Attendees:**

John Nail (City of Westfield)

Dr. Linda Weintraut, Bethany Natali, Dr. Rick Jones (Weintraut & Associates)

Beth McCord, John Carr (IDNR, Division of Historic Preservation and Archaeology)

Patrick Carpenter, Anu Kumar, Kelyn Alexander (INDOT, Cultural Resources)

Jennifer Beck (INDOT Greenfield District)

Robert Dirks (Federal Highway Administration)

Joshua Biggs, Mark Dollase (Indiana Landmarks)

Judith Stanley Shuck (Adjacent Property Owner)

Susan Boyer, Marla Ailor (Westfield Preservation Alliance)

Rebecca McGuckin (Old Town Companies)

Linda Nass (Resident)

Diane Hunter (Miami Tribe of Oklahoma)

Cindy Spoljaric (Westfield City Council)

**Attendees** Leah Perry, Will Lyon, Greg Kicinski (American Structurepoint, Inc.)  
**Observing** Kari Carmany-George (Federal Highway Administration)  
**Meeting:**

- 1) The meeting was held at 1:00 p.m., June 4, 2020, to discuss the State Road (SR) 32 Westfield Reconstruction project, the Section 106 process, review of historic properties, the proposed effects on the historic properties, and the next steps in the Section 106 process.
- 2) Robert Dirks (FHWA) introduced himself and began the meeting explaining FHWA's role in the project and the goal of this meeting.
- 3) Sarah Everhart (Structurepoint) reviewed the agenda for the meeting. The meeting covered a review of the alternatives developed, the historic properties identified, and the proposed effects of the project on the aboveground historic resources.
- 4) Linda Weintraut (W&A) reviewed the Section 106 process. The identification of aboveground historic resources is completed, and identification of the archaeological resources is ongoing.
- 5) Rick Jones (W&A) reviewed the initial archaeology findings. Archaeological fieldwork was completed in January with eight sites found. Five of those sites were associated with historic structures that have been modified or demolished, and one site had a precontact artifact. It currently appears that none of the sites are eligible for the NRHP, but analysis of the artifacts is still ongoing.



- 6) Sarah Everhart discussed the current setting of downtown Westfield concerning specific developments within the project area. The developments discussed were the Grand Junction Park and Plaza, the Union Square at Grand Junction, the local Jersey Street Extension project, and a potential development at the southeast corner of Union Street and SR 32. These multiple developments have the potential to remove buildings in the project area and could remove them before this project begins construction. These developments do not have any association with this project.
  - a) Mark Dollase (Indiana Landmarks) noted that the effects of the developments should not be included in the Section 106 process for this process.
  - b) Sarah Everhart responded that although these developments will, or have the potential to, remove buildings in the area of the project, this project is acting as if all buildings currently in place will be remaining and if the buildings would be affected by the project then those effects will be accounted for.
- 7) Sarah Everhart explained the design of Alternative A, which is to widen SR 32. Ms. Everhart noted the changes from the previous presented design of Alternative A, which includes a shift north in front of the Stultz-Stanley House and the addition of a retaining wall to minimize impacts. Additionally, she explained the anticipated 15-foot utility corridor along the south side of SR 32 and noted that whether utilities remain aboveground or are relocated belowground the clearance space for the utilities would still be needed.
- 8) Sarah Everhart reviewed the design of Alternative A-1, which is to close access at Union Street to provide a reduced typical section through the Westfield Historic District. This is a new alternative that was presented by a consulting party, Judy Shuck, to possibly reduce the impact to the historic district. This alternative includes removing access to Union Street from SR 32 and cul-de-sacs at the new dead ends of Union Street to provide a turnaround for emergency vehicles. The alternative also includes improvements to Penn Street and the addition of the Jersey Street extension to accommodate for the redistributed traffic.
  - a) Robert Dirks (FHWA) noted that the utility corridor represents the main conflict with historic structures at the southeast and southwest corner of SR 32 and Union Street. These could not be avoided with this alternative.
  - b) Mark Dollase (Indiana Landmarks) noted that creating cul-de-sacs in the historic district would not be consistent with the characteristics/time frame of the historic district.
- 9) Joshua Biggs (Indiana Landmarks) asked why this project was needed at all, especially considering that many cities and towns are using road diets in their downtown areas that maintain those historic districts.
  - a) Jennifer Beck (INDOT) responded that every project is different and specific to the area where it is taking place. Many of the other towns utilizing road diets have different situations that provide viable alternative routes. Ms. Beck also noted that in many of those situations the state routes crossing through downtowns are more narrow outside the town and are wider/have more lanes in the town, which makes it feasible to do a road diet in the area. A road diet was examined early in the development of this project and looking at the context, as well as the specific traffic need, it did not work as a viable alternative. There are not many feasible east-west routes in this area. Additionally, this state route is adjacent to a major interchange with US 31, and there are plans to widen SR 32 from east of Westfield to Noblesville.
- 10) Joshua Biggs indicated his concern that if enough resources are lost that the historic district may not be able to be listed in the register any longer. Linda Weintraut noted that could be a possibility.
- 11) Jennifer Beck noted that the existing utilities within the sidewalk are not compliant with the Americans with Disabilities Act (ADA). Due to this, the utilities would have to be relocated regardless.
- 12) Sarah Everhart reviewed the design of Alternative A-2, which restricts access at Union Street to a right-in/right-out scenario. This is a variation of the proposed consulting party alternative, from Judy Shuck, that was evaluated to determine if it would help minimize impacts in the historic district.

- 13) Sarah Everhart reviewed the design of Alternative A-3, which has the same typical sections as Alternative A, but shifts the alignment of the roadway to completely avoid the Stultz-Stanley House property.
- 14) Sarah Everhart reviewed the design of Alternative B, which is the SR 32 and Penn Street one-way pair. The alternative includes extending Penn Street west from where it currently ends to tie into existing SR 32.
  - a) Mark Dollase asked if any house west of the historic district where Penn Street would be extended were individually eligible. Linda Weintraut replied that the homes were included in the APE for the Historic Properties Report and none were recommended individually eligible.
- 15) Sarah Everhart reviewed the design of Alternative C, which is the SR 32 and Jersey Street one-way pair. The alternative includes extending Jersey Street east from where it currently ends at Union Street to tie into the proposed roundabout at East Street.
- 16) Linda Weintraut discussed the identification methodology, per the National Register. Each property must have integrity and have significance under one of the National Register criteria. In addition, a period of significance and historic property boundary are established. This is helpful later in assessing effects. Dr. Weintraut noted that for urban areas the boundaries of historic properties are generally the legal boundary of the parcel.
- 17) Linda Weintraut reviewed the three historic properties that were identified as eligible for or listed on the National Register of Historic Places (NRHP): Dr. Julius L. Benson House, Westfield Historic District, and the Stultz-Stanley House.
- 18) Linda Weintraut reviewed the process for assessing effects. She asked the consulting parties to keep in mind a few key concepts/ideas: why a property is eligible for the NRHP (Criteria and areas of significance); consider effect relative to the historic boundary – within (direct) or outside (indirect); and consider the effect of the current undertaking, not the effects of previous projects before these properties were listed or eligible.
- 19) Linda Weintraut noted that all alternatives have “No Adverse Effect” on the Dr. Julius L. Benson House.
- 20) Linda Weintraut noted that Alternative A would remove five contributing buildings from the Westfield Historic District and would isolate the southern part of the historic district. The alternative has been revised since the last meeting to avoid removal of the Stultz-Stanley House and minimize the impact to the property. This alternative has an Adverse Effect on the Westfield Historic District.
  - a) Judy Shuck noted that she was appreciative that the revised alignment avoids the removal of her house.
- 21) Linda Weintraut said that Alternative A-1 would be similar to Alternative A in that it would remove five contributing buildings from the Westfield Historic District and would isolate the southern part of the historic district. Additionally, it would close access from Union Street to SR 32 in a way that is not compatible with historic use. This alternative will have an Adverse Effect on the district.
  - a) Mark Dollase said that to maintain historic integrity, the transportation routes should be maintained as they were historically. He indicated that this option significantly changes those transportation routes.
- 22) Linda Weintraut stated that Alternative A-2 would be similar to Alternative A in that it would remove five contributing buildings from the Westfield Historic District and would isolate the southern part of the historic district. This alternative has an Adverse Effect to the commercial and architectural significance of the district.
- 23) John Carr asked for clarification on the two buildings at the southwest corner of Union Street and SR 32.
  - a) Sarah Everhart replied that the buildings share a wall and the southern building actually wraps around the west side of the building at the corner. The portion of the southern building that wraps



around towards SR 32 would be impacted, but there is the potential to remove only that portion of the building and the rest to remain.

- b) John Carr asked how it could be determined if the buildings that share walls could be separated without having access to the buildings.
- c) Jennifer Beck indicated that the property owners have been cooperative and as the project further develops, it can be looked into to determine the feasibility of saving connected buildings.

24) Mark Dollase said that although it appears the southern building at the southeast corner of SR 32 and Union Street is being impacted, it does not seem like it needs to be impacted.

- a) Sarah Everhart responded that based on current preliminary design, the removal is required due to the building conflicting with the sidewalk and could be impacted when removing the building at the corner (Erika's). Additionally, ADA compliancy has to be taken into account in the design of the sidewalk; that can make reducing the sidewalk not feasible.
- b) Robert Dirks noted that there could be opportunities for some alternatives to have fewer impacts than are shown here. At this stage in the design, any possible impacts should be accounted for. As design is refined, there could be opportunities to minimize or avoid impacts.

25) Joshua Biggs asked if the City of Westfield had a preferred option.

- a) John Nail said the City would let the alternative selection process play out but recognizes the historic preservation and traffic congestion concerns in this area.
- b) John Nail added that the police and fire departments have concern about the mobility of some alternatives, specifically the closure of Union Street and the one-way pairs. These alternatives may affect response time, which has to be taken into account as well.

26) Mark Dollase noted that every resource has value as part of the district and there are only around fifty buildings in the district.

27) Mark Dollase asked if the utility corridor could be located elsewhere.

- a) John Nail replied that the current location of the utility corridor is the least impactful as opposed to locating it along the other roadways in the area. This is due to the fact that the utilities are already along the south side of SR 32; maintaining them in the same area prevents significant impacts in other areas that don't have the space for utilities to be added.
- b) Linda Naas asked if all utilities would be underground with no poles aboveground.
- c) Ken Olson (Structurepoint) noted that the intent is for the utilities to go underground. Aboveground equipment would still be required even if the utilities are relocated belowground. Whether the utilities move belowground or remain aboveground, the anticipated 15-foot utility corridor would still be needed.

28) Linda Naas asked if there were exceptions to ADA compliancy in historic districts.

- a) Jennifer Beck responded that ADA exceptions are possible, but they have to go through an approval process. Previously, a design exception was requested for this intersection for a minor project; it was not approved. ADA compliance was planned to be included in a larger project like this project. Ms. Beck noted that she has not had any full build projects that have had ADA exceptions granted.

29) Linda Weintraut said that Alternative A-3 would remove six contributing buildings from the Westfield Historic District and would isolate the southern part of the historic district and affect the commercial and architectural significance of the district. This would constitute an Adverse Effect.

30) Linda Weintraut said that Alternative B would remove three contributing buildings from the Westfield Historic District; it would affect both the commercial and residential significance of the district. W&A believes this constitutes an Adverse Effect.

- a) Robert Dirks added that the extension of Penn Street would essentially bisect the residential portion of the historic district.
- 31) John Carr asked if the eastbound right turn lane for SR 32 at Union Street could be removed for Alternative B.
- a) Sarah Everhart explained that the right turn lane is needed based on the traffic data, but that can be looked into again to verify if the turn lanes could be removed.
- 32) Linda Naas asked how Alternative B fits in with a new development along Poplar Street that was recently approved, across from the hospital and north of the dentist office, that mentioned a Penn Street extension.
- a) John Nail said that the Penn Street extension as part of the new development was contemplated a long time ago when the new development was under consideration. This was before the SR 32 project began to be developed. If Alternative B moves forward, the local Penn Street extension (as part of the new development) would most likely not be able to happen.
- 33) Linda Naas noted that Jan Smith, who is a property owner of two homes on Penn Street, had approached the Westfield Preservation Alliance about the historical significance of her houses.
- a) Linda Weintraut asked that she check the Historic Properties Report; those houses should have been within the APE and evaluated. They were not likely considered eligible, since only eligible properties are being discussed at this meeting.
- 34) Linda Weintraut said that Alternative C would remove four contributing buildings from the Westfield Historic District. This will constitute an Adverse Effect since the commercial and architectural significance would be diminished.
- 35) John Carr asked if the bridge on Union Street at the south end of the Westfield Historic District is a contributing structure and if there would be an impact to that bridge.
- a) Sarah Everhart indicated that the project team is attempting to avoid direct impacts to the bridge.
- 36) John Carr asked if the intersection of Union and Jersey Street would be a signalized intersection.
- a) Ken Olson confirmed that it would be a signalized intersection; SR 32 and Union Street would also be signalized.
- 37) Mark Dollase asked if the roadway could be shifted south to avoid the fire station since it is being impacted by the left turn lane at Union and Jersey Street.
- a) Sarah Everhart replied that the turn lane is eleven feet wide; shifting the road to avoid impacts would result in impacts to the bridge (contributing resource to the historic district) and in additional impacts to the Grand Junction Park and Plaza.
- 38) Judy Shuck asked if Jersey Street could be shifted to cross Union Street south of the historic bridge to avoid the fire station and other contributing buildings.
- a) Sarah Everhart responded that would result in the roadway going through the middle of Grand Junction Park and Plaza, which is also a 4(f) resource that must be evaluated for avoidance and minimization opportunities. Shifting the roadway south would potentially affect the overall use of the park, resulting in a more significant 4(f) impact. As currently proposed, Alternative C impacts the northern boundary of park and would likely only have a minor impact on the use of the park. Section 4(f) requires avoidance and minimization of impacts to 4(f) resources and is a much more substantive process than Section 106, which only requires “historic properties” to be identified and project impacts be considered. Additionally, another two crossings of Grassy Branch Creek would be required.
- 39) Linda Naas asked if sidewalks along both sides of Jersey Street are needed.



- a) Sarah Everhart said that could be an option, although removal of the sidewalk along one side of the roadway would not be enough to reduce impacts. In addition, part of the purpose and need of the project is improving mobility for pedestrians. By not providing sidewalks or only providing sidewalks along one side of the street, it would not fully meet the purpose and need of the project. Ms. Everhart indicated the removal of one side of the sidewalk would be looked at to verify it would not reduce impacts.
- 40) Linda Weintraut reviewed the characteristics that SHPO believes make the Stultz-Stanley House eligible for listing in the National Register, the historic property boundary, and the manner in which the setting has changed since 2012. The historic property boundary is oddly shaped because of a prior project that did not consider it an eligible resource.
- 41) Linda Weintraut said that Alternative A has been revised to avoid removal of the Stultz-Stanley House and minimize the impact to the property. Alternative A would acquire right-of-way from the front of the property, remove a mature tree, and construct a retaining wall. This alternative is proposed to have a No Adverse Effect on the Stultz-Stanley House.
  - a) Sarah Everhart indicated that the retaining wall would not be decorative, but a structural wall to support the remaining yard and foundations of the building. There is a significant elevation change between the roadway and the property. The retaining wall would minimize impacts by maintaining five to six feet of level usable yard compared to just sloping the front of the property. This is due to the retaining wall being at the front of the stairs, while a sloped yard would follow the stairs and level out at the top of the stairs. The utility corridor would have to go in front of the retaining wall to maintain access to the utilities.
  - b) Judy Shuck expressed concern over the roadway being widened in front of her house and traffic being closer to the basement of the house. She asked why the road can't be located farther north. She also said she has a National Register nomination under review at the State.
  - c) Ken Olson asked if the north wall of the basement extends past the front of the house.
  - d) Judy Shuck stated that the basement does not extend under the porch or sunroom on the north side of the house.
  - e) Patrick Carpenter noted that if there are determined to be adverse effects, mitigation is done to help offset the adverse effect on resources.
- 42) Linda Weintraut indicated that Alternative A, A-1, and A-2 have the same impacts to the Stultz-Stanley House. Alternative A-3 completely avoids the Stultz-Stanley House property.
- 43) Sarah Everhart reviewed Alternative A-3, which is a complete avoidance of the Stultz-Stanley House. SR 32 would be shifted farther north to completely avoid the boundaries of the property. The alternative would remove the same two buildings along the north side of SR 32 and west of Westlea Drive that are indicated to be removed in the other A alternatives. However, unlike the other A alternatives, Alternative A-3 would fully impact those two buildings along the north side of the roadway and there is no question that they would be removed. The farther shift in the roadway results in additional impacts to the Westfield Historic District by removing the contributing property at the western boundary of the historic district.
  - a) Linda Naas asked if the "Dogs and Suds" (contributing building north of SR 32 at the western boundary of the Westfield Historic District) that is shown as being removed could only be partially removed since the portion impacted is a roof that extends out from the main building.
  - b) Linda Weintraut responded that if that were to happen, the removal of a portion of the building could affect the resource's status as contributing to the historic district. However, this is something that would have to be further discussed with SHPO.
- 44) John Carr asked if the top of the retaining wall in front of the Stultz-Stanley House would be flush with the lawn.

- a) Sarah Everhart indicated that the intention is to have the wall flush with the top of the lawn in order to not affect the view from the house.
- 45) John Carr asked if after constructing the retaining wall would it be possible to add an earthen slope from the back of the sidewalk to the retaining wall to maintain that sloping yard appearance or would this conflict with the utility corridor.
- a) Sarah Everhart responded that there could be issues with the utilities not allowing the slope in front of the wall, but it could be a possibility. That option would have to be assessed once more of the design of the wall is developed and additional coordination has been completed with the utility companies.
- 46) Sarah Everhart noted that as the project has been moving forward there are plans to use a context sensitive design to make sure landscaping elements and architectural characteristics are incorporated into the design.
- a) Mark Dollase noted that it would be appropriate that the retaining wall be surfaced with materials that are more sympathetic to the bungalow style (brick, field stone, etc.).
- 47) Mark Dollase asked who maintains the retaining wall after it is constructed.
- a) Jennifer Beck said that if the retaining wall is within INDOT right-of-way, then INDOT would maintain the wall.
- 48) Judy Shuck said a lot of things had been said in the past that had not happened and that a previous project had also promised to build a retaining wall.
- a) Patrick Carpenter noted that if commitments are made as a result of an adverse finding that there would be a Memorandum of Agreement (MOA) which would detail the mitigation measures; it is legally binding.
- 49) Joshua Biggs asked who makes the final decision on the selected alternative .
- a) Patrick Carpenter indicated that it is FHWA that makes the final decision.
- 50) Patrick Carpenter noted that the federal funding and the historic properties, as well as other public use properties, results in having to follow the Section 4(f) process. The Section 4(f) process is more stringent and if there is an avoidance alternative the meets the project purpose and need and is prudent and feasible, then it has to be selected. If there is no feasible avoidance alternative and all alternatives affect the historic properties, then the least overall harm alternative is determined for those historic properties.
- 51) Linda Naas noted that the interlocal cooperative agreement approved in 2018 indicated a possible pedestrian bridge. Ms. Naas asked if a pedestrian bridge is part of this project or is it a project that would happen later and end up affecting the historic district.
- a) John Nail said that at the time of the interlocal agreement, the City was interested in building a pedestrian bridge, but does not have any intent at this time to build the bridge. The building of a pedestrian bridge is not part of this federal undertaking. If a pedestrian bridge is to be built, it would be locally funded by the City of Westfield.
  - b) John Carr indicated that if the pedestrian bridge was a local project with no state or federal funding, then it would not be required to follow the Section 106 process.
- 52) Sarah Everhart reviewed Alternative B and noted that it has the same impacts as Alternative A on the Stultz-Stanley House.
- 53) Linda Weintraut reviewed Alternative C and the impacts to the Stultz-Stanley House. The alternative goes behind the Stultz-Stanley house and takes a small portion of right-of-way from the southwest corner of the property. There would be no tree removal or addition of a retaining wall.
- a) Judy Shuck asked if the curve could be adjusted so that the roadway would not take the back corner of the property and noted her family uses all of their parcel.



- b) Ken Olson responded that the curve as it is shown in the exhibit is the minimum curve that would meet design standards as well as be a safe for vehicles.
- 54) John Carr asked if there are ways to minimize the amount of right-of-way being taken in the southwest corner of the Stultz-Stanley House property.
- a) John Nail responded that there is still some room for refinement and that is definitely something that can be examined. It would not eliminate the roadway through the parcel, but as the design develops, the project team will do as much as they can to minimize impacts.
- 55) Linda Weintraut summarized the recommended overall project finding of Adverse Effect. This is because each alternative has an Adverse Effect on at least one historic resource.
- a) Linda Weintraut indicated that the Dr. Julius L. Benson House would have a No Adverse Effect for all alternatives.
  - b) Linda Weintraut noted that the Westfield Historic District would be adversely affected by all alternatives.
  - c) Linda Weintraut said that the Stultz-Stanley House has impacts from the retaining wall and the removal of a tree by several alternatives, but it comes down to: does this adversely affect the reasons that make it eligible for the NRHP. This also applies to Alternative C that takes a small portion of the southwest corner of the property.
- 56) Sarah Everhart reviewed the additional impacts outside of Section 106, which includes the Section 4(f) impacts that are not historic. These additional impacts also include impacts to residential and commercial properties in the area. Many of the residential impacts are to multi-family units like the apartments along Penn Street. A majority of the alternatives have large impacts to commercial businesses with minor impacts to residences, but Alternative B has the largest impact to residential units with a small impact to commercial properties.
- 57) Linda Weintraut said that due to the late hour, mitigation will be discussed in the next consulting parties meeting when developing the MOA. Dr. Weintraut thanked everyone for their attendance and encouraged them to start thinking of potential mitigation ideas to discuss in the next meeting.
- 58) John Carr (SHPO) asked if the comment period for the Effects Report might be extended, so the meeting summary can be distributed and referenced in consulting parties' responses.
- a) After consulting with FHWA and INDOT, Sarah Everhart replied that the comment period deadline will be pushed back so that the meeting summary can be distributed and allow consulting parties to respond to both at the same time.
- 59) John Carr asked what constitutes the least overall harm.
- a) Patrick Carpenter responded that it is taking into account the Section 106 impacts only, but the determination is incorporated into the overall Section 4(f) evaluation. An important part of least overall harm is looking at how to mitigate the adverse impacts and which alternative lends itself to better mitigation or what is feasible.
- 60) Sarah Everhart noted that the determination of least overall harm is needed from SHPO, but comments on the effects of the undertaking on historic resources is needed from all consulting parties.
- 61) Sarah Everhart asked for any additional questions, thanked everyone for his or her participation, and adjourned the meeting.

## ACTION ITEMS

- A Meeting Summary will be distributed including an extension to the Effects Report comment period. **(The comment period has been extended to Monday, July 6<sup>th</sup>, 2020)**
- Response from SHPO should include a least overall harm determination.

- Responses from consulting parties should be in regard to the effects of the undertaking on historic resources and what alternative(s) they believe have the least overall harm on the historic resources.
- Consulting parties to be notified when the Effect Finding/800.11 has been released.
- Coordinate next consulting parties meeting.

The minutes of this meeting as described above represent the writer's interpretation of the discussions of the meeting. If your interpretation differs substantially, or if there are items that were overlooked, please contact me at (317) 547-5580 or [severhart@structurepoint.com](mailto:severhart@structurepoint.com) to revise the record.

Very truly yours,  
American Structurepoint, Inc.



Sarah J. Everhart  
Environmental Specialist

SJE:

Enclosures





## INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue  
Room N642  
Indianapolis, Indiana 46204

PHONE: (317) 234-5168

**Eric Holcomb, Governor**  
**Joe McGuinness,**  
**Commissioner**

September 4, 2020

This letter was sent to the listed parties.

Re: DUAL REVIEW: State Road 32 Reconstruction in the City of Westfield, Washington Township, Hamilton County (Des. No. 1801731; DHPA 23531)

Dear Consulting Party (see attached list):

The City of Westfield, with funding from the Federal Highway Administration and administrative oversight from the Indiana Department of Transportation (INDOT), proposes to proceed with the State Road 32 (SR 32) Westfield Reconstruction Project (Des. No. 1801731).

This letter is part of the Section 106 review process for this project. Section 106 of the National Historic Preservation Act requires federal agencies to take into account the effects of their undertakings on historic and archaeological properties. We are requesting comments from you regarding the possible effects of this project. Please use the above Des. Number and project description in your reply and your comments will be incorporated into the formal environmental study.

The intent of this letter and attachments is to respond to questions and statements posed by consulting parties in response to the consulting parties meeting (June 4, 2020), the distribution of the meeting minutes (June 16, 2020) and Effects Report (May 8, 2020).

The proposed undertaking is along SR 32 roughly extending from Poplar Street east to Timberbrook Run and from Jersey Street north to Penn Street in Westfield, Hamilton County, Indiana. It is within Washington Township, Westfield and Noblesville United State Geological Survey (USGS) 7.5 Minute Quadrangle Map in Section 36, Township 19 North, Range 3 East; Section 31, Township 19, Range 4 East; Section 1 Township 18 North, Range 3 East; and Section 6, Township 18 North, Range 4 East.

The purpose of the proposed project is to improve corridor mobility along SR 32 through the downtown Westfield area for both motorists and pedestrians alike. Currently, the existing corridor does not provide a safe traveling environment for motorists or pedestrians, as the existing roadway is overly congested.

Proposed project alternatives being considered at this time include roadway reconstruction of SR 32 that could include added travel lanes and turn lanes, new curb and gutter, new sidewalks, new storm sewer, new lighting, and intersection improvements at Union Street and East Street. Other alternatives being considered include utilizing a one-way pair along Jersey Street and the existing roadway of SR 32 or along Penn Street and the existing roadway of SR 32. It is anticipated that additional permanent and temporary right-of-way would be required to complete the proposed project. However, it is unknown at this time how much temporary and permanent right-of-way would be needed. It is also anticipated that multiple relocations may be required to complete the project depending on the chosen alternative.

[www.in.gov/dot/](http://www.in.gov/dot/)  
**An Equal Opportunity Employer**



American Structurepoint, Inc. is under contract with the City of Westfield to advance the environmental documentation for the referenced project.

In accordance with 36 CFR 800.2 (c), you were invited to become a consulting party as part of the Section 106 process, or you are hereby invited to become a consulting party as part of the Section 106 process. Entities that have previously accepted consulting party status--as well as additional entities that are currently being invited to become consulting parties--are identified in the attached list.

The Section 106 process involves efforts to identify historic properties potentially affected by the undertaking, to assess the undertaking's effects and to seek ways to avoid, minimize, or mitigate any adverse effects on historic properties. For more information regarding the protection of historic resources, please see the Advisory Council on Historic Preservation's guide: *Protecting Historic Properties: A Citizen's Guide to Section 106 Review* available online at <https://www.achp.gov/sites/default/files/documents/2017-01/CitizenGuide.pdf>.

Please note that, per the permanent rule issued by the Indiana Department of Natural Resources effective August 14, 2013 (312 IAC 20-4-11.5), INDOT is requesting that this project be subjected to "dual review"; that is, reviewed by the Division of Historic Preservation and Archaeology simultaneously under 54 U.S.C. 306108 (Section 106) and IC 14-21-1-18 (Indiana Preservation and Archaeology Law dealing with alterations of historic sites and structures requiring a Certificate of Approval). Pursuant to Section 11.5(f) of this rule, at the conclusion of the review process we anticipate that the Division Director would issue a letter of clearance exempting this project from obtaining a Certificate of Approval under IC 14-21-1-18. Enclosed with this letter is a detailed list of the consulting parties with contact information, including email addresses, for processing the dual review submission.

The Area of Potential Effects (APE) is the area in which the proposed project may cause alterations in the character or use of historic resources. The APE contains one property, Westfield Historic District (NR-2521), listed in the National Register of Historic Places (NRHP).

A historian who meets the Secretary of the Interior's Professional Qualification Standards identified and evaluated above-ground resources within the APE for potential eligibility for the NRHP. As a result of the historic property identification and evaluation efforts, the Julius L. Benson House [Indiana Historic Sites and Structures Inventory (IHSSI) No.: 057-464-26015] is recommended as eligible for listing in the NRHP. Per the Indiana SHPO and for the purposes of this Section 106 project, the Stultz-Stanley House (WA 9) at 209 West Main Street is considered eligible for listing in the NRHP.

An archaeologist who meets the Secretary of the Interior's Professional Qualification Standards is conducting a survey of archaeological resources within the APE for potential eligibility for listing in the NRHP. A report of that investigation is forthcoming and will be distributed to the appropriate consulting parties for review at a later date.

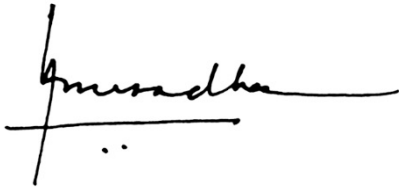
In order to fully respond to all comments posed by consulting parties following the distribution of the Effects Report (May 8, 2020), a comment response form was compiled. The comment response form along with supporting figures and attachments are available for review in IN SCOPE at <http://erms.indot.in.gov/Section106Documents/> (the Des. No. is the most efficient search term, once in IN SCOPE). If you prefer a hard copy of this material, please respond to this email with your request within seven (7) days.

For questions concerning specific project details, you may contact Sarah Everhart of American Structurepoint, Inc. at (317) 547-5580 or [severhart@structurepoint.com](mailto:severhart@structurepoint.com). All future responses regarding the proposed project should be forwarded to American Structurepoint, Inc. at the following address:

Sarah J. Everhart  
Environmental Specialist  
American Structurepoint, Inc.  
9025 River Road, Suite 200  
Indianapolis, IN 46240  
Email: severhart@structurepoint.com  
Phone: (317) 547-5580

Tribal contacts may contact Shaun Miller at [smiller@indot.in.gov](mailto:smiller@indot.in.gov) or 317-233-6795 or Michelle Allen at FHWA at [michelle.allen@dot.gov](mailto:michelle.allen@dot.gov) or 317-226-7344.

Sincerely,



Anuradha V. Kumar, Manager  
Cultural Resources Office  
Environmental Services

Enclosures:  
Comment Response Form (with attachments)

Distribution List:  
Miami Tribe of Oklahoma  
John Carr, INDNR-DHPA  
Joshua Biggs, Indiana Landmarks Central Regional Office  
Susan Boyer, Westfield Preservation Alliance  
Marla Ailor, Westfield Preservation Alliance  
Mayor Andrew Cook, City of Westfield  
Judith Shuck, Property Owner  
Rebecca McGuckin, Old Town Companies  
Mike Johns, Westfield City Council  
Cindy Spoljaric, Westfield City Council  
Robert Dirks, Federal Highway Administration (FHWA)  
American Structurepoint, Inc.  
Weintraut & Associates, Inc.



Comment	Response
<p>1. We also appreciate INDOT's agreeing with our opinion that the Stultz-Stanley House is eligible for inclusion in the National Register of Historic Places ("NRHP") under Criterion C for its architecture. As was mentioned at the June 4 meeting, the Indiana SHPO staff has received an application for nomination of the Stultz-Stanley House to the NRHP. <i>For the purposes of this Section 106 review</i>, we are accepting the current parcel lines of the house as the historic property boundary, although it remains to be seen how the historic property boundary ultimately will be described in the NRHP nomination. In the case of the Stultz-Stanley House, however, it appears that one or more previous right-of-way acquisitions from the original lot took place before the NRHP significance of this house was recognized. We note, however, that the usual rule of thumb that the historic property boundary of an individual urban building follows the legal property boundary might not always hold true. For example, it seems to us that a local government or the state could become the owner of a <i>part</i> a historic property through right-of-way acquisition within the platted lot.</p> <p style="text-align: right;">SHPO July 6, 2020</p>	<p>The City of Westfield, Federal Highway Administration (FHWA)/Indiana Department of Transportation (INDOT) and their consultants wish to thank the Indiana SHPO for their participation in the Section 106 consultation process and for providing comments on the Effects Letter.</p>
<p>2. We would appreciate INDOT's advising us as to whether or not it is going to participate financially in this project. We have been conducting a Dual Review so far, on the assumption that INDOT would eventually provide part of the funding. If there will be no state funding going into the project, however, then the state law aspect of the Dual Review would no longer be applicable. Once the review process reaches the point at which a memorandum of agreement ("MOA") to mitigate adverse effects and to conclude the Section 106 review under 36 C.F.R. Part 800 has been signed, the INDNR-DHPA will have to decide whether the terms of the MOA achieve the purposes and objectives of Indiana Code 14-21-1-18, or, alternatively, whether a certificate of approval application must be filed with INDNR-DHPA and heard by the Indiana Historic Preservation Review Board ("Review Board"). Consequently, INDNR-DHPA will</p>	<p>Yes, the project will receive State funding.</p>

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need to know soon about the funding mix in order to conclude the Dual Review.

SHPO  
July 6, 2020

3. Alternative A

Westfield Historic District: We agree with the effects report that this property would be adversely affected, for the reasons given in the report.

Stultz-Stanley House: We do not agree with the effects report's conclusion that this property would not be adversely affected by Alternative A. The historic property boundary of an urban building typically includes the lot on which the building is sited, and this is true of Criterion C properties, as well. We do not agree that building a retaining wall only several feet from the house (even for the commendable purpose of maintaining the house's and its yard's structural stability) can have no effect on the historic property. The new street-level utility corridor will be cut into the existing slope of the front yard. We are not persuaded that making the top of the approximately four-foot-tall retaining wall flush with the level of the yard a short distance in front of the house would not significantly change the appearance of the front yard from the house. We think this alteration of the historic property would have a more significant visual effect on the historical integrity of the property than would the removal of the large evergreen tree from the northeast corner of the yard. That is not to say that the tree has no personal value to the property owner, but the large evergreen tree probably does not date to the period of significance of the house. Accordingly, we think the acquisition of more right-of-way from the historic property boundary (i.e., in addition to the right-of-way acquired for the earlier roundabout project at Poplar Street), the leveling of the northern part of the yard for the utility corridor, and the construction of the retaining wall across the front yard will adversely affect the Stultz-Stanley House.

Thank you for providing comments on the effects of Alternative A. These comments will be considered and incorporated into the assessment of effects, pursuant to 36 C.F.R. § 800.5(a) and (d)(2).

Dr. Julius L. Benson House: We agree with the effects report that this property would not be adversely affected, for the reasons given in that report.

SHPO  
July 6, 2020

4. Alternative A-1

Westfield Historic District: We agree with the effects report that this property would be adversely affected, for the reasons given in the report.

Stultz-Stanley House: We disagree with the effects report's conclusion that this property would not be adversely affected by this alternative, for the reasons we gave in our discussion of Alternative A.

Dr. Julius L. Benson House: We agree with the effects report that this property would not be adversely affected, for the reasons given in that report.

SHPO  
July 6, 2020

5. Alternative A-2

Westfield Historic District: We agree with the effects report that this property would be adversely affected, for the reasons given in the report.

Stultz-Stanley House: We disagree with the effects report's conclusion that this property would not be adversely affected by this alternative, for the reasons we gave in our discussion of Alternative A.

Dr. Julius L. Benson House: We agree with the effects report that this property would not be adversely affected, for the reasons given in that report.

SHPO

Thank you for providing comments on the effects of Alternative A-1. These comments will be considered and incorporated into the assessment of effects, pursuant to 36 C.F.R. § 800.5(a) and (d)(2).

Thank you for providing comments on the effects of Alternative A-2. These comments will be considered and incorporated into the assessment of effects, pursuant to 36 C.F.R. § 800.5(a) and (d)(2).



July 6, 2020

**6. Alternative A-3**

Westfield Historic District: We agree with the effects report that this property would be adversely affected, for the reasons given in the report.

Stultz-Stanley House: We agree with the effects report's conclusion that this property would not be adversely affected by this alternative. The setting would change because SR 32 (Main Street) apparently would move farther away from the front of the house, and buildings across the street would be demolished, but the residential character of the setting west of the house was largely lost several years ago as a result of the roundabout project. Nothing very important about what remains of the setting to the north would be lost, and nothing that would detract from the house's significance and appearance would be added onto or immediately adjacent to the Stultz-Stanley House. The lot on which the house sits would not be reduced in size.

Dr. Julius L. Benson House: We agree with the effects report that this property would not be adversely affected, for the reasons given in that report.

Thank you for providing comments on the effects of Alternative A-3. These comments will be considered and incorporated into the assessment of effects, pursuant to 36 C.F.R. § 800.5(a) and (d)(2).

SHPO

July 6, 2020

**7. Alternative B**

Westfield Historic District: We agree with the effects report that this property would be adversely affected, for the reasons given in the report.

Stultz-Stanley House: We disagree with the effects report's conclusion that this property would not be adversely affected by this alternative, for the reasons we gave in our discussion of Alternative A.

Thank you for providing comments on the effects of Alternative B. These comments will be considered and incorporated into the assessment of effects, pursuant to 36 C.F.R. § 800.5(a) and (d)(2).

Dr. Julius L. Benson House: We agree with the effects report that this property would not be adversely affected, for the reasons given in that report.

SHPO  
July 6, 2020

8. Alternative C

Westfield Historic District: We agree with the effects report that this property would be adversely affected, for the reasons given in the report. We note, however, that at the June 4 meeting, the project team indicated it is likely that the this alternative would avoid having a physical impact on the Union Street bridge over Grassy Branch Creek, which contributes to the significance of the district.

Stultz-Stanley House: We disagree with the effects report's conclusion that this property would not be adversely affected by this alternative. The effects report indicates that, although no right-of-way would be acquired from the northern (front) yard of the house, 0.022 acre of right-of-way would be acquired from the southern part of the lot (i.e., back yard of the house). The moderately-sized yard of the Stultz-Stanley House, as we mentioned earlier, is part of the historic property of the house. In the abstract, the estimated 0.022 acre of right-of-way that would be acquired may not sound like much, but it amounts to about 960 square feet, which is a significant piece to slice off a shady corner of a moderately-sized back yard. We recall that the property owner said during the June 4 meeting that her family uses every bit of the yard, which we think speaks to the ability to use and enjoy the historic property (see 36 C.F.R. § 800.5[a][2][iv]: "Change of the character of the property's use"). That use and enjoyment could be lost, in part, by the acquisition of 960 square feet. Also, we have the impression from the discussion at the meeting that, at this very preliminary design stage for Alternative C, it is not entirely clear what the piece of right-of-way to be acquired would look like. For all these reasons, we think that FHWA should determine that the effect on the Stultz-Stanley House would be adverse (see 36 C.F.R. § 800.5[a][1]: "undertaking may alter").

Thank you for providing comments on the effects of Alternative C. These comments will be considered and incorporated into the assessment of effects, pursuant to 36 C.F.R. § 800.5(a) and (d)(2).

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Dr. Julius L. Benson House: We agree with the effects report that this property would not be adversely affected, for the reasons given in that report.

SHPO  
July 6, 2020

**9. MITIGATION**

The local consulting parties would be in the best position to suggest meaningful mitigation for adverse effects. However, we think that, at the least, photographic documentation should be prepared depicting historic buildings that would be demolished or otherwise adversely affected and streetscapes that would be widened and corridors that would be cut through the Westfield Historic District.

SHPO  
July 6, 2020

Thank you for providing comments on mitigation for the Westfield Historic District.

- 10.** For the alternatives that would acquire right-of-way from the front yard of the individually eligible Stultz-Stanley House, perhaps low shrubbery could be planted above or below the retaining wall to soften or mask the view of the drop-off, or perhaps, as one or more consulting parties suggested, a decorative treatment could be added to the face of the retaining wall that would complement the house, which would stand only several feet behind the wall.

SHPO  
July 6, 2020

Thank you for providing comments on mitigation for the Stultz-Stanley House.

**11. LEAST OVERALL HARM**

Any of the alternatives would do considerable damage to the Westfield Historic District. Alternatives A, A-1, A-2, and A-3 all would visually and physically separate the northern and southern parts of the district more than B and C. The local consulting parties might have insights into what would be most important to preserve, and we hope they express their thoughts on the subject.

SHPO  
July 6, 2020

Thank you for providing comments on least overall harm.

- 12.** Taking the alternatives at face value, we think Alternative B might do the least overall harm to above-ground historic properties, although it would result in probably two contributing buildings being removed

Thank you for providing comments on least overall harm.



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at the southwest corner of Main Street (current SR 32) and Union Street, the heart of the Westfield Historic District. Alternative C would appear to do the next least amount of harm to above-ground properties, although it would remove at least two buildings at the southeast corner of Main and Union.

SHPO

July 6, 2020

- 13.** However, given that the City of Westfield has expressed its intent to extend Jersey Street to the east of Union, whether or not as part of this project, Alternative C might not do a great deal more harm to the district than B.

SHPO

July 6, 2020

Thank you for providing comments on least overall harm.

Although there are intentions by the City of Westfield to complete a Jersey Street Extension project, that project would not be a federal undertaking and, like the planned private developments along SR 32, impacts by that project have not been taken into consideration when evaluating the impacts of the alternatives for this federal undertaking.

Thank you for providing comments on least overall harm.

- 14.** Consequently, we ask that the need to construct turn lanes at Union on either eastbound (Alternative B) or westbound (Alternative C) Main be reconsidered, in order to minimize the amount of right-of-way needed along Main. We can understand how eliminating the traffic signal on Main at Union would allow traffic to move more smoothly. However, with the existing roundabout on Main at Poplar Street and the proposed roundabout at East Street, traffic will not flow unimpeded on Main under either B or C. A driver on Main still will have to watch for and possibly yield to traffic coming around the roundabout on his or her left before entering the roundabout, and at peak traffic times, that wait may not be brief, causing traffic to back up behind that driver. Consequently, it is not obvious to us that adding turn lanes at the Main and Union intersection will improve the flow of traffic much more.

SHPO

July 6, 2020

INDOT requested turn lanes along the one-way pairs in order to mitigate operational concerns along the roadway. Dedicated turn lanes promote mobility and traffic flow along the corridor, while also reducing congestion attributed to trailing vehicles slowing down behind a turning vehicle. Research found a 25% increase in capacity, on average, for roadways that added a left-turn lane. For right turn lanes, there is a clear relationship between the number of vehicles attempting a right turn in through traffic and the delay to through traffic. At intersections with substantial right turn movements, a dedicated right turn lane segregates these cars from through traffic and increases the capacity of the road.<sup>1</sup>

Additionally, dedicated turn lanes are beneficial to safety, as fewer crashes are expected to occur when providing exclusive turn lanes. Studies have demonstrated that exclusive left-turn lanes reduce crashes 50%, on average, and specifically reduce rear-end collision between 60% to 80%.<sup>1</sup>

The traffic signal at Union and Main (SR 32) will continue to exist for Alternative B and Alternative C due to the need to provide a pedestrian

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<sup>1</sup> <https://safety.fhwa.dot.gov/geometric/pubs/accessmgmtbrochure/turning.htm>

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crossing. Please refer to bullet 36(a) in the June 4, 2020 Consulting Party Meeting Minutes.

A Traffic Operations Analysis was completed by American Structurepoint, Inc. on May 30, 2019, to evaluate the existing and future traffic operating conditions for the SR 32 study corridor. The standard parameter used to evaluate traffic operating conditions is referred to as the level-of-service (LOS). There are six LOS (A through F) which relate to driving conditions from best to worst, respectively. LOS for signalized and unsignalized (stop-control and roundabout) intersections is defined in terms of control delay per vehicle, which is a direct correlation to driver discomfort, frustration, fuel consumption, and lost travel time.<sup>2</sup> The peak hours for this project were defined as 7:00 AM to 9:00 AM for the AM peak hours and 4:00 PM to 6:00 PM for the PM peak hours.

In general for the analysis, the operating conditions of intersections were considered to be acceptable if found to operate as LOS D or better for the overall intersection, with no approach operating worse than LOS E.

When specifically looking at the SR 32 and East Street intersection capacity analysis results, the intersection under the No Build Alternative is expected to operate at an overall LOS A during the Design Year (2042) AM and PM peak hours with a 5.6 second and 5.7 second delay respectively. However, the southbound movement is expected to operate at LOS D in the AM peak hour with a 121.7 second delay and LOS E during the PM peak hour with a 239.2 second delay (Appendix A, A-53 to A-54). Southbound traffic approaching the SR 32 & East Street intersection is delayed when attempting to turn onto SR 32 due to the congestion on SR 32 in combination with the free flow condition for eastbound and westbound movement.

For Alternative B in the Design Year (2042), the intersection of SR 32 and East Street is expected to operate at an overall LOS A during the AM and PM peak hours with a 4.2 second and 4.0 second delay respectively. For

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<sup>2</sup> Highway Capacity Manual (HCM)

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this one-way pair, the southbound movement is removed due to Penn Street now operating as westbound SR 32 (Appendix A, A-57 to A-58).

For Alternative C in the Design Year (2042), the intersection of SR 32 and East Street is expected to operate as an overall LOS A during the AM and PM peak hours with a 3.7 second delay during both peak hours. The southbound movement for the intersection is expected to operate at and LOS A with a 6.9 second delay (Appendix A, A-59 to A-60).

- 15.** After review and consideration of each of the alternatives, we believe Alternative C: One-Way Pair Jersey Street Eastbound and SR 32 Westbound creates the least overall harm on the historic district. Furthermore, we believe that retention the historic buildings at 102 S. Union and 111 E. Main are integral in maintaining the sense of cohesion in the historic district.

*Indiana Landmarks  
July 6, 2020*

The City of Westfield, FHWA/INDOT and their consultants wish to thank Indiana Landmarks for their participation in the Section 106 consultation process and for providing comments on the Effects Letter.

- 16.** Though Alternative C is one of the more costly alternatives at \$21,738,700, a large portion of these funds will be dedicated to the improvement and extension of Jersey Street, a project in which the City of Westfield was already interested in completing, independent of this Section 106 project. Take away the funds solely for the improvement and extension of Jersey Street, and Alternative C likely becomes the least costly alternative.

*Indiana Landmarks  
July 6, 2020*

Thank you for providing comments on least overall harm.

Although there are intentions by the City of Westfield to complete a Jersey Street Extension project, that project would not be a federal undertaking and, like the planned private developments along SR 32, impacts by that project have not be taken into consideration when evaluating the impacts of the alternatives for this federal undertaking.

- 17.** None of the other alternatives call for the extension and improvement of Jersey Street.

*Indiana Landmarks  
July 6, 2020*

Thank you for providing comments on least overall harm.

Alternative A-I, Reduced Typical Section Through Historic District and Closure of Union Street, also requires the extension of Jersey Street from Union Street to East Street (Appendix B, B-3). Please refer to Page 20 of the Effects Report and bullet 8 in the June 4, 2020 Consulting Party Meeting Minutes.

- 18.** If Alternative C is chosen, we ask project leaders to consider how to alleviate the need for a left turn lane onto Union Street at Main, or to reconfigure the turn lane in such a way, to retain the

Thank you for providing comments on least overall harm.



aforementioned historic buildings. Because SR 32 would be operating as a one-way thoroughfare through downtown Westfield, we opine that there is no need for a dedicated left turn lane on onto Union Street.

*Indiana Landmarks  
July 6, 2020*

INDOT requested turn lanes along the one-way pairs in order to mitigate operational concerns along the roadway. Dedicated turn lanes promote mobility and traffic flow along the corridor, while also reducing congestion attributed to trailing vehicles slowing down behind a turning vehicle. Research found a 25% increase in capacity, on average, for roadways that added a left-turn lane. For right turn lanes, there is a clear relationship between the number of vehicles attempting a right turn in through traffic and the delay to through traffic. At intersections with substantial right turn movements, a dedicated right turn lane segregates these cars from through traffic and increases the capacity of the road.<sup>1</sup>

Additionally, dedicated turn lanes are beneficial to safety, as fewer crashes are expected to occur when providing exclusive turn lanes. Studies have demonstrated that exclusive left-turn lanes reduce crashes 50%, on average, and specifically reduce rear-end collision between 60% to 80%.<sup>1</sup>

- 19.** Indiana Landmarks is concerned that any historic resources are to be demolished as part of this Section 106 project and though we believe that Alternative C is the “least destructive” alternative, we are not in favor or support of any of the six alternatives. We believe that the removal of viable downtown structures is counterintuitive to best modern-day planning practices and can be avoided. Cities and downtowns across the country are, alternatively, slowing down traffic through their downtowns and retaining historic structures, even along state highways and busy vehicular thoroughfares.

*Indiana Landmarks  
July 6, 2020*

Thank you for this comment regarding Alternative C. These comments will be considered and incorporated into the assessment of effects, pursuant to 36 C.F.R. § 800.5(a) and (d)(2).

Please refer to bullet 9(a) in the June 4, 2020 Consulting Party Meeting Minutes.

Additionally, the existing average daily traffic (ADT) on SR 32 is approximately 17,000 veh/day, which exceeds the ADT volume threshold for a 3-lane roadway. Therefore, a 3-lane roadway is not considered to have adequate capacity for this amount of traffic. The 3-lane alternative does not meet the purpose and need of the project. Road diets are generally only applicable to areas with specific site characteristics in which a reduction in travel lanes would not be detrimental to the capacity of the corridor. For this specific project area, the traffic volumes on SR 32 are high enough such that the roadway would be over-capacity as a 3-lane road.<sup>3</sup>

<sup>3</sup> 2020 Florida Department of Transportation (FDOT) Quality/Level of Service Handbook ([https://fdotwww.blob.core.windows.net/sitefinity/docs/default-source/planning/systems/programs/sm/los/pdfs/fdot\\_qlos\\_handbook\\_june-2020.pdf?sfvrsn=98f689a7\\_2](https://fdotwww.blob.core.windows.net/sitefinity/docs/default-source/planning/systems/programs/sm/los/pdfs/fdot_qlos_handbook_june-2020.pdf?sfvrsn=98f689a7_2))

- 20.** We ask that American Structurepoint create and present a seventh alternative which does not impact any historic resources. We believe it is important to outline how this Section 106 project would look if the historic district were to remain intact, and that this alternative should be given top priority.

*Indiana Landmarks  
July 6, 2020*

Based on continuing and ongoing evaluation, there are no alternatives that can simultaneously meet the project's purpose and need while also avoiding all Section 106 resources. All reasonable alternatives result in an impact to Section 106 resources. Given the extensive north-south boundaries of the Westfield Historic District, and the east-west nature of the transportation corridor need, no other avoidance alternatives, besides the No Build Alternative and the Bypass Alternative, were identified that would not result in an impact to Section 106 resources.

A Traffic Operations Analysis was completed by American Structurepoint, Inc. on May 30, 2019 (Appendix A), to evaluate the existing and future traffic operating conditions for the SR 32 study corridor.

The standard parameter used to evaluate traffic operating conditions is referred to as the level-of-service (LOS). There are six LOS (A through F) which relate to driving conditions from best to worst, respectively. LOS for signalized and unsignalized (stop-control and roundabout) intersections is defined in terms of control delay per vehicle, which is a direct correlation to driver discomfort, frustration, fuel consumption, and lost travel time.<sup>2</sup> The peak hours for this project were defined as 7:00 AM to 9:00 AM for the AM peak hours and 4:00 PM to 6:00 PM for the PM peak hours.

In general for the analysis, the operating conditions of intersections were considered to be acceptable if found to operate as LOS D or better for the overall intersection, with no approach operating worse than LOS E.

Queue lengths were evaluated for all approaches to each intersection to determine the potential impact that queuing at each intersection has on adjacent intersections nearby. The standard parameter used for measuring queuing is the 95th percentile queue length. The 95th percentile queue length encapsulates the traffic conditions occurring 95 percent of the time, and removes the 5 percent of occurrences that are considered to be rare. The 95th percentile queue length was compared to the distance

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between intersections to determine if the queue length would cause backup into the next intersection.

The 95th percentile queue length was compared to the distances between intersections. The eastbound 95th percentile queue length at Union Street was considered to be an issue when it would begin to affect the Poplar Street approach.

The No Build alternative would leave the existing SR 32 roadway as it currently exists. No reconstruction of the roadway to meet the project's purpose and need would be implemented. The existing roadway would continue to be congested further impeding traffic flow at numerous drives and intersection along the corridor. The SR 32 & Union Street intersection is expected to operate at LOS F during the design year (2042) with 95th percentile queue lengths exceeding 1,350 feet in both directions along SR 32 (Appendix A, A-53 to A-54). The queuing on the eastbound approach specifically results in backups into the Poplar Street roundabout and impacts access to the Riverview Health Hospital and the Westfield Intermediate and Middle Schools. This would further decrease the corridor mobility through the project area. The No Build Alternative would not meet the purpose and need of the project.

As discussed in the January 17, 2020 Response to Consulting Parties letter, the Bypass alternative would not meet the purpose and need of the project. Refer to page 2 of the January 17, 2020 letter for further discussion of the Bypass Alternative.

- 21.** It has been a privilege to have been part of the group of consulting parties on this project.

*Judith Stanley Shuck  
July 6, 2020*

The City of Westfield, FHWA/INDOT and their consultants wish to thank Ms. Shuck for participating in the Section 106 consultation process and for providing comments on the Effects Letter.

- 22.** Residents would like to see the trucks use State Road 38 and maybe use 191st street. I even used 191st to go to Cicero the other day and it was great. After all it is the residents that use and will pay for 32.

As discussed in the January 17, 2020 Response to Consulting Parties letter, traffic is the most congested during peak hour volumes (7:00 AM – 9:00 AM, 4:00 PM – 6:00 PM). Based on data from the Traffic Operations Analysis dated May 30, 2019 (Appendix A) and ongoing evaluations, the



<p><i>Judith Stanley Shuck</i> <i>July 6, 2020</i></p>	<p>percentage of truck traffic is approximately 2% during peak hours. Due to the small percentage of truck traffic, redirecting the truck traffic away from SR 32 would not address the overall traffic congestion issues during peak hours. The Bypass alternative would not meet the purpose and need of the project. Refer to page 2 of the January 17, 2020 letter for further discussion of the Bypass Alternative.</p>
<p><b>23.</b> All of the designs (and please don't refer the one plan that it was mine. I submitted it for a friend) go against the information given for the reasons of the 106 agreement by the Federal Government. Historic Structures do not need to be destroyed. It is not progress, it is regression.</p> <p><i>Judith Stanley Shuck</i> <i>July 6, 2020</i></p>	<p>Section 106 of the National Historic Preservation Act of 1966 requires federal agencies "take into account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register" and to afford the Advisory Council on Historic Preservation "a reasonable opportunity to comment with regard to such undertaking" (16 U.S.C. 470f).</p> <p>Views of the consulting parties are being sought on the impacts of each alternative presented in the effects letter, pursuant to 36 C.F.R. § 800.5(a) and (d)(2).</p> <p>The City of Westfield, FHWA/INDOT, and their consultants will continue seeking, discussing, and considering the views of consulting parties for this project.</p>
<p><b>24.</b> I have studied Weintraut and Associates "Effects Report: State Road (SR) 32 Westfield Reconstruction Project" dated April 23, 2020. I have also read the Inter-Local Agreement between INDOT &amp; the City of Westfield dated September 27, 2018.</p> <p><i>Mike Johns, City Council Member</i> <i>July 6, 2020</i></p>	<p>The City of Westfield, FHWA/INDOT and their consultants wish to thank Mr. Johns for participating in the Section 106 consultation process and for providing comments on the Effects Letter.</p>
<p><b>25.</b> Structure Point has highlighted a need for the project noting that "the existing corridor does not provide an efficient traveling environment for motorists, bicyclists or pedestrians". They have sighted the purpose of the project "to improve corridor mobility along SR 32 through the downtown Westfield area for both motorists and pedestrians alike". I would like to suggest, that sometimes the simplest and least expensive option can be the best</p>	<p>Thank you for providing comments on the effects of each alternative on historic properties.</p> <p>Pedestrian mobility is a qualitative assessment of the walkability of pedestrian infrastructure. In each alternative, sidewalk is being provided along both sides of the roadway to maintain the existing pedestrian facilities that are being provided. In addition, the existing pedestrian</p>

alternative and the most desirable action. As I have mentioned, none of the 6 proposed alternatives identified to this point maintain the historic integrity of our downtown nor do they promote walkability and pedestrian safety. To the contrary, the proposed alternatives would accomplish the exact opposite.

*Mike Johns, City Council Member  
July 6, 2020*

facilities are not compliant with the Americans with Disabilities Act (ADA) and each alternative proposes ADA compliant sidewalks, curb ramps, and cross walks.

New pedestrian crossings of SR 32 will be added under Alternatives A, A-1, A-2, and A-3. The new pedestrian crossing locations include a mid-block crossing between Walnut and Cherry Street, as well as pedestrian crossings on each leg of the roundabout at East Street (where the existing East Street Intersection has no crossing of SR 32). These crossings include pedestrian refuge islands mid crossing. Pedestrian refuge islands can reduce pedestrian-related crashes by up to 56%.

<https://safety.fhwa.dot.gov/provencountermeasures/pdfs/fhwasa17064.pdf>

These additional protected crossings will improve pedestrian mobility through the project corridor, as pedestrians will now have multiple locations to safely cross the roadway. New pavement markings for crosswalks will also be provided at breaks in the sidewalk to improve the visibility for both pedestrians and vehicles yielding to pedestrians.

All alternatives maintain a pedestrian signal at the SR 32 and Union Street intersection.

- 26.** My recommendation is to retain INDOT'S original plan to improve SR 32. We currently have a 3 ½ lane road that with sidewalks is 70 feet wide. As others have pointed out, this space could easily be engineered to accommodate a boulevard with two lanes of traffic and center turn lanes as needed. By following this simple plan and eliminating any street parking we can envision a boulevard or parkway setting with trees and landscaping that will encourage walkability while providing full access to motorists and pedestrians alike. Simply put, we don't need a 4 lane highway through the center of our town, what we need is a welcoming boulevard.

*Mike Johns, City Council Member  
July 6, 2020*

It is not clear what proposed typical roadway section is being referenced in regards to "INDOT's original plan to improve SR 32". However, INDOT's last consideration of a 3-lane section along this corridor was over 20 years ago and is no longer relevant for current traffic counts and patterns.

Concerning a 3-lane roadway, the existing average daily traffic (ADT) on SR 32 is approximately 17,000 veh/day, which exceeds the ADT volume threshold for a 3-lane roadway. Therefore, a 3-lane roadway is not considered to have adequate capacity for this amount of traffic. The 3-lane alternative does not meet the purpose and need of the project. Road diets are generally only applicable to areas with specific site characteristics in which a reduction in travel lanes would not be detrimental to the capacity of the corridor. For this specific project area, the traffic volumes

	on SR 32 are high enough such that the roadway would be over-capacity as a 3-lane road. <sup>3</sup>
	Please see response to comment 26 discussing pedestrian mobility and safety.
<p><b>27.</b> Westfield Preservation Alliance (WPA) is a non-profit community service organization that seeks to preserve historic structures in the geographic area of Westfield-Washington Township by promoting preservation, revitalization, and community growth. Since its establishment, WPA has been primarily focused on Westfield's rich history and buildings. Having received the declaration of Westfield's Downtown Historic District from the National Register of Historic Places in August 2019, we have remained engaged as a consulting party on the State Road 32 Reconstruction (Des. No. 1801731) Project.</p> <p style="text-align: right;"><i>Westfield Preservation Alliance</i> July 6, 2020</p>	<p>The City of Westfield, FHWA/INDOT and their consultants wish to thank the Westfield Preservation Alliance for participating in the Section 106 consultation process and for providing comments on the Effects Letter.</p>
<p><b>28.</b> WPA finds it necessary to reiterate a couple of especially important facts from the Advisory Council on Historic Preservation (ACHP) in response to the "Effects Report: State Road 32 Westfield Reconstruction Project", dated April 23, 2020.</p> <ul style="list-style-type: none"> <li>• "Explore measures to avoid or reduce harm ("adverse effect") to historic properties."</li> <li>• "Section 106 review encourages, but does not mandate, preservation."</li> <li>• Most importantly, in section 800.I of the ACHP document under the heading "Protection of Historic Properties," it states, "Commencing at the early stages of project planning...when historic properties may be harmed, Section 106 review usually ends with a legally binding agreement that establishes how the federal agency will avoid, minimize, or mitigate the adverse effects."</li> </ul> <p style="text-align: right;"><i>Westfield Preservation Alliance</i> July 6, 2020</p>	<p>Thank you for providing these comments on the Section 106 process.</p> <p>Interested consulting parties may access the referenced information in the ACHP's "Protecting Historic Properties: A Citizen's Guide to Section 106 Review"  <a href="https://www.achp.gov/sites/default/files/documents/2017-01/CitizenGuide.pdf">https://www.achp.gov/sites/default/files/documents/2017-01/CitizenGuide.pdf</a></p> <p>A Memorandum of Agreement, which is a legally binding agreement, will be signed at the end of the Section 106 process. It will establish how FHWA will avoid, minimize and mitigate any adverse effects.</p>
<p><b>29.</b> As stated, "the purpose of the project is to improve corridor mobility along SR 32 through the downtown for both motorists and</p>	<p>Thank you for this comment. The four sequential steps of the Section 106 process are:</p>



pedestrians,” yet the engineering alternatives provided to Weintraut & Associates by American Structurepoint Inc. do very little, in our collective opinion, to resolve, mitigate or preserve the consequences and damages to Westfield’s Historic Downtown through the six proposals for reconstruction of State Road 32 detailed in the report...

Westfield Preservation Alliance  
July 6, 2020

- Step 1.** Establish the Undertaking/Initiate Section 106
- Step 2.** Identify historic properties
- Step 3.** Assess effects of the undertaking on historic properties
- Step 4.** Resolve any adverse effects

The effects letter has been distributed to consulting parties as part of **Step 3.** Views of the consulting parties are being sought on the impacts of each alternative presented in the effects letter, pursuant to 36 C.F.R. § 800.5(a) and (d)(2).

**Step 4** of the Section 106 process explores ways to avoid, minimize, or mitigate adverse effects. This step occurs after a federal agency determines a project will have an adverse effect on historic properties.

However, the City of Westfield, FHWA/INDOT, and their consultants examined a range of alternatives that would meet the project purpose and need also while also exploring ways to minimize impacts to historic properties:

- **Alternative A:** After the identification of the Stultz-Stanley House as a historic resource, this alternative was designed to **minimize** impacts
- **Alternative A-2:** The designers sought to **minimize** impacts within the Westfield Historic District by reducing the typical section.
- **Alternative A-3:** This alternative was developed to **avoid** the Stultz-Stanley House.

**30.** ...nor facilitate traffic or pedestrian mobility as intended.

Westfield Preservation Alliance  
July 6, 2020

A Traffic Operations Analysis was completed by American Structurepoint, Inc. on May 30, 2019 (Appendix A), to evaluate the existing and future traffic operating conditions for the SR 32 study corridor. The standard parameter used to evaluate traffic operating conditions is referred to as the level-of-service (LOS). There are six LOS (A through F) which relate to driving conditions from best to worst, respectively. LOS for signalized and unsignalized (stop-control and roundabout) intersections is defined in

terms of control delay per vehicle, which is a direct correlation to driver discomfort, frustration, fuel consumption, and lost travel time.

In the Design Year (2042), Alternative E (No Build) is expected to operate at an overall LOS of F. Alternatives A, A-1, A-3, B, and C are expected to operate at an overall LOS of C.

Pedestrian mobility is a qualitative assessment of the walkability of pedestrian infrastructure. In each alternative, sidewalk is being provided along both sides of the roadway to maintain the existing pedestrian facilities that are being provided. In addition, the existing pedestrian facilities are not compliant with the Americans with Disabilities Act (ADA) and each alternative proposes ADA compliant sidewalks, curb ramps, and cross walks.

New pedestrian crossings of SR 32 will be added under Alternatives A, A-1, A-2, and A-3. The new pedestrian crossing locations include a mid-block crossing between Walnut and Cherry Street, as well as pedestrian crossings on each leg of the roundabout at East Street (where the existing East Street Intersection has no crossing of SR 32). These crossings include pedestrian refuge islands mid crossing. Pedestrian refuge islands can reduce pedestrian-related crashes by up to 56%. (<https://safety.fhwa.dot.gov/provencountermeasures/pdfs/fhwasal7064.pdf>)

These additional protected crossings will improve pedestrian mobility through the project corridor, as pedestrians will now have multiple locations to safely cross the roadway. New pavement markings for crosswalks will also be provided at breaks in the sidewalk to improve the visibility for both pedestrians and vehicles yielding to pedestrians.

All alternatives maintain a pedestrian signal at the SR 32 and Union Street intersection.

**31.** In fact, the report has shown to slow traffic even further in most of the alternatives.

*Westfield Preservation Alliance  
July 6, 2020*

In Appendix I, Page 2 of the Effects Letter the Average Travel Time Benefits (Minutes Per Driver) is listed in the table. The green numbers indicate a benefit to drivers, meaning a reduction in the travel time, while the red numbers indicate a detriment to drivers, meaning an increase in

<p><b>32.</b> It is concerning, to say the least, of the offered options today; each and every option calls for the destruction of no less than 3 and as many as 6 buildings in Westfield’s Historic District, along with many other buildings that are, in some cases, considered staples of our community and includes a minimum of 10 units and as many as 18 units.</p> <p style="text-align: right;"><i>Westfield Preservation Alliance</i> July 6, 2020</p>	<p>the travel time. Alternatives A, A-3, B, and C are a benefit to the driver and decrease the travel time. Alternatives A-1 and A-2 do not benefit the driver and increase the travel time.</p> <p>Alternatives A and A-3 have the most benefit to drivers by reducing travel time by 3.3 minutes.</p> <p>Thank you for this comment. While the Section 106 process focuses on impacts to historic resources, the impact of the project on other aspects of the environment and community are being examined as part of the environmental process.</p>
<p><b>33.</b> Also, of the offered six options in the “Effects Report,” only two satisfy the request of improving corridor mobility, in terms of actual travel time through the downtown area</p> <p style="text-align: right;"><i>Westfield Preservation Alliance</i> July 6, 2020</p>	<p>In Appendix 1, Page 2 of the Effects Letter the Average Travel Time Benefits (Minutes Per Driver) is listed in the table. The green numbers indicate a benefit to drivers, meaning a reduction in the travel time, while the red numbers indicate a detriment to drivers, meaning an increase in the travel time. Alternatives A, A-3, B, and C are a benefit to the driver and decrease the travel time. Alternatives A-1 and A-2 do not benefit the driver and increase the travel time.</p> <p>Alternatives A and A-3 have the most benefit to drivers by reducing travel time by 3.3 minutes.</p>
<p><b>34.</b></p> <ul style="list-style-type: none"> <li>• The reconstruction of State Road 32 planning began in approximately 2008 (according to local documents available in the City of Westfield’s Comprehensive Plan/Grand Junction Subdistrict Addendum adopted in 2016). It was only in 2018, when INDOT agreed with the City of Westfield’s proposal to grant the city a maximum of \$7.5 Million Dollars for land acquisition, funding and completion of said project, through an Interlocal Agreement, without full knowledge of what that project might look like or the effect it might have on the community. Moreover, no mention of a 106 Review was ever made.</li> </ul> <p style="text-align: right;"><i>Westfield Preservation Alliance</i></p>	<p>Section 106 is initiated when it is determined or anticipated that a project will include federal funding (or is carried out, assisted, permitted, licensed, or approved by a federal agency). It was not determined that federal funds would be involved until 2018. A project generally is not developed beyond the initial scoping until funding has been dedicated for the project. Once funding for the project is dedicated, a contractor must be selected through an interview process to complete the Section 106 and design the proposed alternatives. The Section 106 process and outcome is incorporated into the National Environmental Policy Act (NEPA) process.</p>



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July 6, 2020

- 35.** • The City's addition of the Poplar Street extension from David Brown Drive to State Road 32 (to the south of the Shamrock Boulevard Roundabout) may alleviate some traffic congestion that can be attributed to traffic flow on State Road 32 and/or at Union Street. As residents of this community, we share the opinion that many of the previously stated concerns have been and will be alleviated upon completion of the Poplar Street extension. However, it should be noted that this only can be attributed to traffic from the west side of Westfield.

*Westfield Preservation Alliance  
July 6, 2020*

The extension of Poplar Street, as well as the potential developments that the extension would bring, was considered in the Traffic Operations Analysis that was completed by American Structurepoint, Inc. on May 30, 2019 (Appendix A). The extension of Poplar Street alone has a negligible impact on traffic patterns through the project area. Traffic volumes on SR 32 would not be altered, as this is still the only major east-west route through the heart of Westfield. Traffic volumes at Union Street would not change in magnitude, but may have slightly altered turning movements. The intersection of SR 32 & Union Street would remain over-capacity with or without the Poplar Street extension.

- 36.** • In reference to the previous bullet, the Shamrock Boulevard/Poplar Street Roundabout provides entrance to Westfield's Riverview Hospital, Middle and Intermediate Schools, and additional commercial and multi-family development. Page 6 of the "Effects Report" notes already obstructed traffic concerns due to the current pattern that Westfield recently created. WPA feels strongly that widening or attempting to improve traffic mobility by removing historic properties or demolition to the east of this roundabout, will only serve to further inhibit traffic flow based on existing conditions and does nothing to mitigate or solve problems, as this is the only entrance to these properties. If due to queuing as indicated, one must ask, "Will speeding up or slowing down traffic with an additional roundabout, located to the east of State Road 32 and Union, appropriately address any queuing problem, or create a larger one, within one-half mile of the other?"

*Westfield Preservation Alliance  
July 6, 2020*

The congestion issues at the Poplar Street roundabout are not due to the roundabout itself, but due to the extensive queueing from the Union Street signalized intersection.

A Traffic Operations Analysis was completed by American Structurepoint, Inc. on May 30, 2019 (Appendix A), to evaluate the existing and future traffic operating conditions for the SR 32 study corridor. The standard parameter used to evaluate traffic operating conditions is referred to as the level-of-service (LOS). There are six LOS (A through F) which relate to driving conditions from best to worst, respectively. LOS for signalized and unsignalized (stop-control and roundabout) intersections is defined in terms of control delay per vehicle, which is a direct correlation to driver discomfort, frustration, fuel consumption, and lost travel time.<sup>2</sup> The peak hours for this project were defined as 7:00 AM to 9:00 AM for the AM peak hours and 4:00 PM to 6:00 PM for the PM peak hours.

In general for the analysis, the operating conditions of intersections were considered to be acceptable if found to operate as LOS D or better for the overall intersection, with no approach operating worse than LOS E.

Queue lengths were evaluated for all approaches to each intersection to determine the potential impact that queuing at each intersection has on

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adjacent intersections nearby. The standard parameter used for measuring queuing is the 95th percentile queue length. The 95th percentile queue length encapsulates the traffic conditions occurring 95 percent of the time, and removes the 5 percent of occurrences that are considered to be rare. The 95th percentile queue length was compared to the distance between intersections to determine if the queue length would cause backup into the next intersection.

The 95th percentile queue length was compared to the distances between intersections. The eastbound 95th percentile queue length at Union Street was considered to be an issue when it would begin to affect the Poplar Street approach.

#### SR 32 and Union Street Intersection

Based on the capacity analysis results, in 2019 under existing conditions (No Build) the SR 32 & Union Street intersection is expected to have a 95th percentile queue length, which exceeds 950 feet for the westbound approach in the AM peak hour and 900 feet for the eastbound approach in the PM peak hour (Appendix A, A-43 to A-44). Due to the extensive queuing on SR 32 at Union Street, traffic flow is impeded at other driveways and major intersections along the corridor. In particular, the Poplar Street/Shamrock Boulevard roundabout is negatively impacted when slowed or stopped vehicles on SR 32 create a gridlock and prevent other vehicles from entering the roundabout. Slowed/stopped traffic through a roundabout compromises the safety of the intersection as driver expectations change and typical gaps in traffic are no longer available.

By the projected Opening Year (2022) of the project, under existing conditions (No Build) the SR 32 and Union Street intersection westbound and eastbound approaches are expected to have queue lengths that exceed 1,000 feet for their respective peak directions (Appendix A, A-45 to A-46). This results in vehicle congestion that backs up to just west of East Street for westbound traffic during the AM peak hour, and

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congestion that occurs in the exit leg of the Poplar Street roundabout for eastbound traffic during the PM peak hour.

By the Design Year (2042) of the project, under existing conditions (No Build) the SR 32 and Union Street intersections westbound approach is expected to have a queue length of 1,475 feet in the AM peak hour. This queue length would cause vehicle congestion that backs up almost to Hillcrest Drive. In the PM peak hour, the eastbound approach is expected to have a queue length of 1,375 feet (Appendix A, A-53 to A-54). This queue length would cause vehicle congestion to back up into the Poplar Street roundabout. Overall, the No Build alternative would have an LOS F in the Design Year (2042).

Alternatives A, A-1, A-3, B, and C are expected to operate at an overall LOS C in the Design Year (2042). Alternative A-2 is expected to operate at an overall LOS D in the Design Year (2042). For Alternatives A and A-3, the SR 32 and Union Street westbound approach (AM peak hour) and the eastbound approach (PM peak hour) are expected to have a queue length of 375 feet (Appendix A, A-55 to A-56). For Alternatives A-1 and A-2, the queue lengths at SR 32 and Union Street would be similar to Alternative A and A-3 due the presence of a pedestrian crossing signal.

For Alternative B, the Penn Street and Union Street westbound approach in the AM peak hour (new westbound movement for SR 32) is expected to have a queue length of 250 feet. The SR 32 and Union Street eastbound approach in the PM peak hour is expected to have a queue length of 275 feet (Appendix A, A-57 to A-58). For Alternative C, the SR 32 and Union Street westbound approach (AM peak hour) and the eastbound approach (PM peak hour) are expected to have a queue length of 275 feet (Appendix A, A-59 to A-60).

#### SR 32 and East Street Intersection

The SR 32 and East Street intersection under the No Build Alternative is expected to operate at an overall LOS A during the Design Year (2042) AM and PM peak hours. However, the southbound movement is expected

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to operate at LOS D in the AM peak hour with a 121.7 second delay and LOS E during the PM peak hour with a 239.2 second delay (Appendix A, A-53 to A-54). Southbound traffic approaching the SR 32 & East Street intersection is delayed when attempting to turn onto SR 32 due to the congestion on SR 32 in combination with the free flow condition for eastbound and westbound movement. There would be no queue length or delay at this intersection for the westbound and eastbound approaches since under existing conditions it isn't a stop controlled or signalized intersection.

For Alternatives A and A-3 in the Design Year (2042), the intersection of SR 32 and East Street is expected to operate at an overall LOS A in the AM and PM peak hours with a westbound approach queue length of 50 feet and an eastbound approach queue length of 75 feet respectively (Appendix A, A-55 to A-56). The LOS and queue lengths for Alternatives A-1 and A-2 would be similar to Alternative A and A-3.

For Alternative B in the Design Year (2042), the intersection of SR 32 and East Street is expected to operate at an overall LOS A during the AM and PM peak hours with a westbound approach queue length of 50 feet and an eastbound approach queue length of 75 feet respectively (Appendix A, A-57 to A-58).

For Alternative C in the Design Year (2042), the intersection of SR 32 and East Street is expected to operate as an overall LOS A during the AM and PM peak hours with a westbound approach queue length of 50 feet in the AM peak hour (Appendix A, A-59 to A-60). There would be no eastbound approach for this alternative and instead the traffic that would be eastbound would approach the intersection from the south heading northbound. The northbound approach queue length would be 75 feet in the PM peak hour at the SR 32 and East Street intersection.

Based on the capacity analysis results, the queue lengths are expected to be significantly reduced at the SR 32 and Union Street intersection and all alternatives are expected to have an acceptable LOS. Additionally, a roundabout at the SR 32 and East Street intersection would not reduce

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the LOS of the intersection or create a significant queue length issue that would affect adjacent intersections.

- 37.** • On page 5 of the “Effects Report,” it is suggested that the scope of this project extends to Timberbrook Run, a local subdivision located on the southside of State Road 32, and east of East Street. While we appreciate the nod of historical significance to the Julius L. Benson House and we are pleased that it will not be affected; though we also believe it would not have been impacted as it is beyond the area of construction within the APE, it seems insincere and disingenuous to define it as preservation.

*Westfield Preservation Alliance  
July 6, 2020*

As noted in 36 CFR § 800.5(a)(2), effects of a project are not limited to direct impacts within a construction area: “An adverse effect is found when an undertaking may alter, directly or *indirectly*, any of the characteristics of a historic property that qualify the property for inclusion in the National Register . . . *Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative [emphasis added].*”

As described in the effects letter, the alternatives would introduce visual and atmospheric elements [36 CFR § 800.5(a)(2)(v)] but those effects would not diminish the eligibility of the Benson House for listing in the National Register.

The establishment of the Area of Potential Effects, identification of the Benson House as a historic property, and the evaluation of effects to the Benson House are part of the Section 106 process.

These actions are not defined as preservation.

- 38.** • Page 5, paragraph 4 mentions that State Road 32 “does not provide a safe traveling environment for motorists or pedestrians as the existing roadway is congested.” Again, as WPA members are residents of Westfield, we disagree. Future pedestrian crossing(s) not anticipated in the “Effects Reports” would surely adversely and further effect additional historic properties.

*Westfield Preservation Alliance  
July 6, 2020*

A Traffic Operations Analysis was completed by American Structurepoint, Inc. on May 30, 2019 (Appendix A), to evaluate the existing and future traffic operating conditions for the SR 32 study corridor. The standard parameter used to evaluate traffic operating conditions is referred to as the level-of-service (LOS). There are six LOS (A through F) which relate to driving conditions from best to worst, respectively. LOS for signalized and unsignalized (stop-control and roundabout) intersections is defined in terms of control delay per vehicle, which is a direct correlation to driver discomfort, frustration, fuel consumption, and lost travel time.<sup>2</sup> The peak hours for this project were defined as 7:00 AM to 9:00 AM for the AM peak hours and 4:00 PM to 6:00 PM for the PM peak hours.

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In general for the analysis, the operating conditions of intersections were considered to be acceptable if found to operate as LOS D or better for the overall intersection, with no approach operating worse than LOS E.

Queue lengths were evaluated for all approaches to each intersection to determine the potential impact that queuing at each intersection has on adjacent intersections nearby. The standard parameter used for measuring queuing is the 95th percentile queue length. The 95th percentile queue length encapsulates the traffic conditions occurring 95 percent of the time, and removes the 5 percent of occurrences that are considered to be rare. The 95th percentile queue length was compared to the distance between intersections to determine if the queue length would cause backup into the next intersection.

The 95th percentile queue length was compared to the distances between intersections. The eastbound 95th percentile queue length at Union Street was considered to be an issue when it would begin to affect the Poplar Street approach. This is due to the impact that the queue length would have on the Poplar Street roundabout, which would result in a restriction of access to Riverview Health Hospital and the Westfield Intermediate and Middle Schools. The westbound 95th percentile queue length at Union Street was considered to be an issue when it would begin to affect Cherry Street resulting in two intersecting streets being blocked by the backup. The analysis was completed for the existing conditions at the signalized intersection without any improvements to SR 32.

Based on the capacity analysis results, the SR 32 & Union Street intersection is expected to operate at LOS D under existing conditions (No Build) in the 2019 AM peak hour and LOS C in the 2019 PM peak hour; however, the 95th percentile queue length exceeds 950 feet for the westbound approach in the AM peak hour and 900 feet for the eastbound approach in the PM peak hour (Appendix A, A-43 to A-44). Due to the extensive queuing on SR 32 at Union Street, traffic flow is impeded at other driveways and major intersections along the corridor. In particular, the Poplar Street/Shamrock Boulevard roundabout is negatively impacted when slowed or stopped vehicles on SR 32 create a gridlock and prevent

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other vehicles from entering the roundabout. Slowed/stopped traffic through a roundabout compromises the safety of the intersection as driver expectations change and typical gaps in traffic are no longer available.

By the projected Opening Year (2022) of the project, new developments in the vicinity of downtown Westfield are anticipated to occur. The developments are anticipated to increase traffic volumes on SR 32 through the study corridor, which is expected to worsen the aforementioned conditions. The expected overall LOS of the SR 32 and Union Street intersection under existing conditions (No Build) projected for the Opening Year of 2022 is LOS E in the AM peak hour and LOS D in the PM peak hour. The traffic analysis shows that several movements of the SR 32 & Union Street intersection will operate at LOS E or worse, and the queue lengths exceed 1,000 feet for the respective peak directions (Appendix A, A-45 to A-46). This results in vehicle congestion that backs up to just west of East Street for westbound traffic during the AM peak hour, and congestion that occurs in the exit leg of the Poplar Street roundabout for eastbound traffic during the PM peak hour.

By the Design Year (2042) of the project, the overall LOS of the SR 32 and Union Street intersection under existing conditions (No Build) is expected to be LOS F in the AM peak hour and LOS E for the PM peak hour. The analysis shows that multiple approaches for the intersection operate at LOS F in the AM and PM peak hours. For the AM peak hour, three out of four approaches are operating at a LOS F with the westbound movement having a queue length of 1,475 feet. This queue length would cause vehicle congestion that backs up almost to Hillcrest Drive. The PM peak hour has two out of four approaches operating at a LOS F with the eastbound approach having a queue length of 1,375 feet (Appendix A, A-53 to A-54). This queue length would cause vehicle congestion that backs up into the Poplar Street roundabout.

- 39.** • Plans for the \$30 million-dollar Grand Junction mixed-use development mentioned loosely in the last paragraph of page 6 and continued on page 7 in the “Effects Report” is considered a driving factor in the State Road 32

Thank you for this comment. The assessment of effects is limited to the impacts of the SR 32 Westfield Reconstruction Project (Des. No.: 1801731; DHPA No.: 23531) alternatives, since this project is receiving Federal funding and is therefore, subject to Section 106 of the NHPA. The

Reconstruction. As Mark Dollase commented during the June 4th meeting (6(a) in the summary notes), “the effects of the developments should not be included in the Section 106 process.” WPA asserts that future development is a driving force behind this project, as State Road 32 Reconstruction seems wholly unnecessary. As WPA assesses the situation, most of the provided alternatives cause a loss of connectivity to the Grand Junction Park Plaza and businesses on Union Street to the south of State Road 32. Current literature and information suggest a walkable downtown is preferable in maintaining the integrity of a complete downtown community which is available to us now.

*Westfield Preservation Alliance  
July 6, 2020*

Federal involvement for this project is independent of private development occurring elsewhere.

The Union Square at Grand Junction development is not a driving force of this project. Per the response to comment 38, there are already existing traffic issues along SR 32 due to the extensive queueing at the SR 32 and Union Street intersection.

Pedestrian mobility is a qualitative assessment of the walkability of pedestrian infrastructure. In each alternative, sidewalk is being provided along both sides of the roadway to maintain the existing pedestrian facilities that are being provided. In addition, the existing pedestrian facilities are not compliant with the Americans with Disabilities Act (ADA) and each alternative proposes ADA compliant sidewalks, curb ramps, and cross walks.

New pedestrian crossings of SR 32 will be added under Alternatives A, A-1, A-2, and A-3. The new pedestrian crossing locations include a mid-block crossing between Walnut and Cherry Street, as well as pedestrian crossings on each leg of the roundabout at East Street (where the existing East Street Intersection has no crossing of SR 32). These crossings include pedestrian refuge islands mid crossing. Pedestrian refuge islands can reduce pedestrian-related crashes by up to 56%.

(<https://safety.fhwa.dot.gov/provencountermeasures/pdfs/fhwasal7064.pdf>)

These additional protected crossings will improve pedestrian mobility through the project corridor, as pedestrians will now have multiple locations to safely cross the roadway. New pavement markings for crosswalks will also be provided at breaks in the sidewalk to improve the visibility for both pedestrians and vehicles yielding to pedestrians.

All alternatives maintain a pedestrian signal at the SR 32 and Union Street intersection.

- 40.**     • We are pleased that the Stultz-Stanley Home is considered eligible for listing in the NRHP, but we generally disagree

Thank you for this comment regarding the effects of the project alternatives under the Stultz-Stanley House. These comments will be

with the report regarding the construction alternatives not posing an adverse effect. The Stultz-Stanley Home is, after all, inhabited by a direct descendant of the Stanley family, and her husband, who must enter into traffic on State Road 32 from their driveway. Adverse effects being relative, the residents and their children, grandchildren and friends will only be able to leave their driveway by entering into eastbound traffic with any changes made to the roadway via all current alternatives. As well, this home would lose a significant portion of its front yard and driveway. It has recently been approved on the Indiana State Registry of Historical Places and its application for the National is pending. In the interim, we believe a retaining wall and/or reduction in yard frontage, for the sake of any alternative in the “Effects Report” should be considered detrimental.

*Westfield Preservation Alliance*  
*July 6, 2020*

considered and incorporated into the assessment of effects, pursuant to 36 C.F.R. § 800.5(a) and (d)(2).

41. While the 106 Process puts the focus on our history, the provided alternatives have failed in each and every rendering to protect these buildings of value. Rather, the plans provided are a shallow attempt to circumnavigate a process which should have begun years ago as the historical significance of Westfield’s downtown was established in the “Interim Report” circa 1978.

*Westfield Preservation Alliance*  
*July 6, 2020*

The project team examined a range of alternatives, including some that avoided or minimized impacts to historic resources.

The project team has sought, discussed, and considered the views of consulting parties in the following ways: modified Alternative A, introduced Alternative A-1 after input from consulting parties, introduced Alternative A-2 to minimize impacts in the Westfield Historic District, and introduced Alternative A-3 to avoid the Stultz-Stanley House.

Section 106 is a process that does not have a mandated outcome. As noted in a *Citizen’s Guide to Section 106*, “Section 106 review encourages, but does not mandate preservation. Sometimes there is no way for a needed project to proceed without harming historic properties.”<sup>4</sup>

The Section 106 process occurs when a project will be funded in a whole or in part by a federal agency. The Section 106 process for this project

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<sup>4</sup> A *Citizens Guide to Section 106 Review*, <https://www.achp.gov/sites/default/files/documents/2017-01/CitizenGuide.pdf>



	<p>does not apply to past actions or current actions not funded by a federal agency.</p> <p>A project generally is not developed beyond the initial scoping until funding has been dedicated for the project. Once funding for the project is dedicated, a contractor must be selected through an interview process to complete the Section 106 and design the proposed alternatives. The Section 106 process and outcome is incorporated into the National Environmental Policy Act (NEPA) process.</p>
<p>42. WPA does not oppose the construction of the East Street roundabout but asks that business property owners and residential homeowners on the northern extension of it be consulted regarding adverse effects as they are vital to the integrity and spirit of our downtown.</p> <p style="text-align: right;"><i>Westfield Preservation Alliance</i> July 6, 2020</p>	<p>For the Section 106 process, “Adverse Effects” as defined in 36 CFR § 800.5(a)(1) apply only to properties listed in or eligible for listing in the National Register.</p> <p>As part of the NEPA process and development of the Environmental Assessment, these business property owners and residential homeowners received a mailed copy of the Public Information Meeting Notice and were encouraged to attend the Public Information Meeting on August 22, 2019. The Public Information Meeting Notice was distributed to 197 property owners and businesses on August 9, 2019. The notice was also posted to the City of Westfield’s website and was promoted by the City through their social media pages. The Public Information Meeting was held on August 22, 2019 where the project was explained, questions were answered, and comments by the public were collected. Everyone in attendance at the Public Information Meeting were encouraged to provide their comments on the project. The presentation and exhibits were also posted to the City of Westfield’s website and the public, whether they attended the meeting or not, were encouraged to submit comments. Additionally, the same property owners will receive a notice to the next Public Information Meeting.</p>
<p>43. In the spirit of preservation, cooperation, and responsible growth, WPA has been extremely thoughtful about which of the available alternatives is the least intrusive. We are inclined to report we find none of the alternatives acceptable because each and every one causes</p>	<p>Thank you for considering the alternatives presented in the effects letter.</p> <p>The project team appreciates consulting party input and has sought, discussed, and considered the views of consulting parties in the following ways: modified Alternative A, introduced Alternative A-I after input from</p>

damage to our historic district and no offer has been made to date to avoid, minimize or mitigate the damage.

*Westfield Preservation Alliance  
July 6, 2020*

consulting parties, introduced Alternative A-2 to minimize impacts in the Westfield Historic District, introduced Alternative A-3 to avoid the Stultz-Stanley House.

Additionally, a No Build alternative (Alternative E) and a Bypass Alternative (Alternative F) were identified and evaluated, but were found to not meet the purpose and need of the project.

The No Build alternative would leave the existing SR 32 roadway as it currently exists. No reconstruction of the roadway to meet the project's purpose and need would be implemented. The existing roadway would continue to be congested further impeding traffic flow at numerous drives and intersection along the corridor. The SR 32 & Union Street intersection is expected to operate at LOS F during the design year (2042) with 95th percentile queue lengths exceeding 1,350 feet in both directions along SR 32 (Appendix A, A-53 to A-54). The queuing on the eastbound approach specifically results in backups into the Poplar Street roundabout and impacts access to the Riverview Health Hospital and the Westfield Intermediate and Middle Schools. This would further decrease the corridor mobility through the project area. The No Build Alternative would not meet the purpose and need of the project.

Please refer to page 2 of the January 17, 2020 Response to Consulting Parties letter for further discussion of the Bypass Alternative.

Under the Section 106 process, actions to "avoid, minimize, or mitigate" will occur as part of **Step 4. Resolve Adverse Effects**.

Consultation on avoidance, minimization, and mitigation will occur for this project.

44. Rather, our city planning department has chosen to add an amphitheater to the Grand Junction Plaza and the reconstruction alternatives offer four lanes of traffic promoting an even louder audible negative effect (36 CFR, Section 800.5(a)(2)(v).

*Westfield Preservation Alliance*

The Section 106 process considers impacts from projects by a federal agency; the Section 106 process does not avoid, minimize, or mitigate audible effects from private or locally-funded projects.

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July 6, 2020

45. When asked about the Jersey Street alignment, citing concerns from both the local fire and police chiefs, he commented that the one-way paired-streets alternatives are choices to be avoided. We believe Mr. Nail's comments are likely accurate, but ask why American Structurepoint would produce alternatives which amount to nothing more than a charade or was it to camouflage a lack of alternatives?  
*Westfield Preservation Alliance*  
July 6, 2020

The process of developing alternatives is to find alternatives that have the potential to meet the purpose and need and evaluate the impacts of those alternatives. This includes traffic data, design criteria, Section 106 impacts, Section 4(f) impacts, public comments on the alternatives, and the effects they have on the local communities. All of the different criteria are evaluated to determine how well the alternative meets the purpose and need, but also weigh the different impacts the alternative has compared to other alternatives.

46. Preceding Mr. Nail's comments, the Director of the Board of Public Works, Jeremy Lollar, explained that INDOT would be bidding "our East Street Project." Is this the roundabout shown in all of the alternatives on State Road 32? Is it appropriate to bid this project prior to coming to an agreement?  
*Westfield Preservation Alliance*  
July 6, 2020

The East Street project that was referenced in the June Board of Public Works meeting is the East Street North Extension project from 196<sup>th</sup> Street to SR 38, which is not within the vicinity of the SR 32 Reconstruction project. The East Street North Extension project was let on July 8<sup>th</sup> and is a federally funded project through the Indianapolis MPO.

47. permitting ample room to consider other alternatives which would include:  
• INDOT's original plan to improve State Road 32.  
*Westfield Preservation Alliance*  
July 6, 2020

It is not clear what proposed typical roadway section is being referenced in regards to "INDOT's original plan to improve SR 32". However, INDOT's last consideration of a 3-lane section along this corridor was over 20 years ago and is no longer relevant for current traffic counts and patterns.

Concerning a 3-lane roadway, the existing average daily traffic (ADT) on SR 32 is approximately 17,000 veh/day, which exceeds the ADT volume threshold for a 3-lane roadway. Therefore, a 3-lane roadway is not considered to have adequate capacity for this amount of traffic. The 3-lane alternative does not meet the purpose and need of the project. Road diets are generally only applicable to areas with specific site characteristics in which a reduction in travel lanes would not be detrimental to the capacity of the corridor. For this specific project area, the traffic volumes on SR 32 are high enough such that the roadway would be over-capacity as a 3-lane road.<sup>3</sup>



48. • Alternative E (the No Build option). As consultants, we do not agree with the findings from page 10 of the “Effects Report” removing it, as we still consider it viable. We would like to take this opportunity to ask for a current schematic of the existing State Road 32 from Poplar Street to East Street with notations of existing lanes, parking, street lights, utilities, etc.

*Westfield Preservation Alliance  
July 6, 2020*

No Build alternatives (or also called Do Nothing alternatives) evaluate what would happen if nothing to improve the roadway were to occur. Any kind of reconstruction activity, even within the boundaries of the existing curb or right-of-way, would not fall under a No Build alternative. This is because some form of Build action is taking place. No Build alternatives do include general maintenance activities.

Alternative E (No Build) would leave the existing SR 32 roadway as it currently is. No reconstruction of the roadway to meet the project’s purpose and need would be implemented. The existing roadway would continue to be congested further impeding traffic flow at numerous drives and intersection along the corridor. The SR 32 & Union Street intersection is expected to operate at LOS F during the design year (2042) with 95th percentile queue lengths exceeding 1,350 feet in both directions along SR 32 (Appendix A, A-53 to A-54). The queuing on the eastbound approach specifically results in backups into the Poplar Street roundabout and impacts access to the Riverview Health Hospital and the Westfield Intermediate and Middle Schools. This would further decrease the corridor mobility through the project area. The No Build Alternative would not meet the purpose and need of the project.

An exhibit is attached showing the existing conditions within the project area.

49. • Creating and engineering a new alternative that has NO EFFECT on any buildings or businesses within the APE. In fact, according to page 69 of the Westfield-Washington Comprehensive Plan, during the 1999 planning process, “Citizen input at public meetings listed the historic downtown as one of the top four features to preserve and protect in Westfield. Downtown improvements ranked among the top five issues for future consideration.”

*Westfield Preservation Alliance  
July 6, 2020*

The City of Westfield, FHWA/INDOT and its consultants welcome suggestions from consulting parties for alternatives that would have no effect on historic resources and still meet purpose and need.

The project team recognizes that the Westfield Historic District is an important resource to the community and that it is listed in the National Register of Historic Places.

Based on continuing and ongoing evaluation, there are no alternatives that can simultaneously meet the project’s purpose and need while also avoiding all Section 106 resources. All reasonable alternatives result in an impact to Section 106 resources. Given the extensive north-south boundaries of the Westfield Historic District, and the east-west nature of

	<p>the transportation corridor need, no other avoidance alternatives, besides the No Build Alternative and the Bypass Alternative, were identified that would not result in an impact to Section 106 resources.</p> <p>The No Build alternative would leave the existing SR 32 roadway as it currently exists. No reconstruction of the roadway to meet the project's purpose and need would be implemented. The existing roadway would continue to be congested further impeding traffic flow at numerous drives and intersection along the corridor. The SR 32 &amp; Union Street intersection is expected to operate at LOS F during the design year (2042) with 95th percentile queue lengths exceeding 1,350 feet in both directions along SR 32 (Appendix A, A-53 to A-54). The queuing on the eastbound approach specifically results in backups into the Poplar Street roundabout and impacts access to the Riverview Health Hospital and the Westfield Intermediate and Middle Schools. This would further decrease the corridor mobility through the project area. The No Build Alternative would not meet the purpose and need of the project.</p> <p>As discussed in the January 17, 2020 Response to Consulting Parties letter, the Bypass alternative would not meet the purpose and need of the project. Refer to page 2 of the January 17, 2020 letter for further discussion of the Bypass Alternative.</p>
<p>50. • State Road 32 streetscape can be improved with planters or options not taking street space, improvements to facades etc. for this half-mile.</p> <p style="text-align: right;"><i>Westfield Preservation Alliance July 6, 2020</i></p>	<p>Thank you for this comment. Streetscape improvements will be considered and implemented if they do not result in additional impacts by alternatives.</p>
<p>51. • A three-lane conversion construction plan engineered with two lanes of traffic and a center turn lane. This may be accomplished by eliminating the on-street parking of the State-owned highway. Additionally, if space permits, we envision a boulevard or parkway setting with landscaping and features that encourage walkability and full access by motorists and pedestrians alike. In Indiana, cities that have</p>	<p>The existing ADT on SR 32 is approximately 17,000 veh/day, which exceeds the ADT volume threshold for a 3-lane roadway. Therefore, a 3-lane roadway is not considered to have adequate capacity for this amount of traffic. The 3-lane alternative does not meet the purpose and need of the project. Road diets are generally only applicable to areas with specific site characteristics in which a reduction in travel lanes would not be detrimental to the capacity of the corridor. For this specific project area,</p>

<p>utilized this option are Fortville, Lebanon, Greenfield, Plainfield, Noblesville, Indianapolis, and Nashville.  <i>Westfield Preservation Alliance</i>  <i>July 6, 2020</i></p>	<p>the traffic volumes on SR 32 are high enough such that the roadway would be over-capacity as a 3-lane road.<sup>3</sup></p> <p>Additionally, please refer to bullet 9(a) in the June 4, 2020 Consulting Party Meeting Minutes.</p>
<p>52. Truly, little about the current alternatives anticipate the mobility of pedestrian traffic in Westfield’s near future, instead it is more considerate of motorist traffic. Plans include the convergence of six trails in an effort to promote walkability.  <i>Westfield Preservation Alliance</i>  <i>July 6, 2020</i></p>	<p>Pedestrian mobility is a qualitative assessment of the walkability of pedestrian infrastructure. In each alternative, sidewalk is being provided along both sides of the roadway to maintain the existing pedestrian facilities that are being provided. In addition, the existing pedestrian facilities are not compliant with the Americans with Disabilities Act (ADA) and each alternative proposes ADA compliant sidewalks, curb ramps, and cross walks.</p> <p>New pedestrian crossings of SR 32 will be added under Alternatives A, A-1, A-2, and A-3. The new pedestrian crossing locations include a mid-block crossing between Walnut and Cherry Street, as well as pedestrian crossings on each leg of the roundabout at East Street (where the existing East Street Intersection has no crossing of SR 32). These crossings include pedestrian refuge islands mid crossing. Pedestrian refuge islands can reduce pedestrian-related crashes by up to 56%.  <a href="https://safety.fhwa.dot.gov/provencountermeasures/pdfs/fhwasa17064.pdf">https://safety.fhwa.dot.gov/provencountermeasures/pdfs/fhwasa17064.pdf</a></p> <p>These additional protected crossings will improve pedestrian mobility through the project corridor, as pedestrians will now have multiple locations to safely cross the roadway. New pavement markings for crosswalks will also be provided at breaks in the sidewalk to improve the visibility for both pedestrians and vehicles yielding to pedestrians.</p> <p>All alternatives maintain a pedestrian signal at the SR 32 and Union Street intersection.</p>
<p>53. The 2013 Grand Junction Implementation Plan (which is inclusive of the historic district) includes this summary of comments:</p>	<p>Thank you for providing this information about the Grand Junction Implementation Plan. This plan is independent of the SR 32 Westfield Reconstruction Project (Des. No.: 1801731; DHPPA No.: 23531);</p>



1. Consider creating an advisory group or commission made up of people from the community to provide oversight on historic and cultural preservation.
2. As work continues on the Grand Junction initiative, continue treating citizens and history with respect. Consider better methods of communication among the different groups involved in and affected by the initiative.
3. Consider incorporating (or clarifying) the following themes in Grand Junction initiatives going forward: pride, charm, and respect for our history.

*Westfield Preservation Alliance  
July 6, 2020*

however, impacts to historic resources for the SR 32 project are being consider under Section 106.

In addition to the communication with consulting parties as part of the Section 106 process, additional public involvement has taken place.

A Community Advisory Committee (CAC) was compiled with invitations to various representatives of organizations distributed on July 12, 2019. A CAC meeting took place on July 29, 2019 that explained the project, answered questions by the representatives, and compiled comments from those representatives.

As part of the NEPA process and development of the Environmental Assessment, these business property owners and residential homeowners received a mailed copy of the Public Information Meeting Notice and were encouraged to attend the Public Information Meeting on August 22, 2019. The Public Information Meeting Notice was distributed to 197 property owners and businesses on August 9, 2019. The notice was also posted to the City of Westfield's website and was promoted by the City through their social media pages. The Public Information Meeting was held on August 22, 2019 where the project was explained, questions were answered, and comments by the public were collected. Everyone in attendance at the Public Information Meeting were encouraged to provide their comments on the project. The presentation and exhibits were also posted to the City of Westfield's website and the public, whether they attended the meeting or not, were encouraged to submit comments. Additionally, the same property owners will receive a notice to the next Public Information Meeting.

54. Following the four steps of the 106 Review process as noted by the ACHP regulations, the consulting parties should be agreeance on a plan and WPA asserts, we are not there yet.

*Westfield Preservation Alliance  
July 6, 2020*

The four sequential steps of the Section 106 process are:

- Step 1.** Establish the Undertaking/Initiate Section 106
- Step 2.** Identify historic properties
- Step 3.** Assess effects of the undertaking on historic properties
- Step 4.** Resolve any adverse effects

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Section 106 is the “process of seeking, discussing, and considering the views of consulting parties about how project effects on historic properties should be handled.” This process does not mandate a specific outcome and does require agreement by all parties involved; however, the views of consulting parties are an important part of the process and are taken into account is the selection of the preferred alternative.

City of Westfield, FHWA/INDOT, and their consultants are following the Section 106 process and appreciate the input of consulting parties about project effects.

The project team has sought, discussed, and considered the views of consulting parties in the following ways: modified Alternative A, introduced Alternative A-1 after input from consulting parties, introduced Alternative A-2 to minimize impacts in the Westfield Historic District, and introduced Alternative A-3 to avoid the Stultz-Stanley House.

The City of Westfield, FHWA/INDOT, and their consultants will continue seeking, discussing, and considering the views of consulting parties for this project.

55. We are disappointed that no effort or suggestion has been made to relocate, maintain, or protect our buildings.

*Westfield Preservation Alliance  
July 6, 2020*

As this process moves to **Step 4. Resolve any adverse effects**, avoidance, minimization, and mitigation options will be discussed.

We are currently working with **Step 3. Assess effects of the undertaking** on historic properties, but we are interested in suggestions from consulting parties in regards to minimization and/ mitigation.

56. We would like to point out a visual and description of a desirable alternative. Unfortunately, when "Alternative E (No Build)" was dismissed from further analysis - page 10 Effects Report, the Comprehensive Plan of Westfield-Washington Township was not considered. We shared some of our Comprehensive Plan in our response but would like to point out this page of that Plan.

No Build alternatives (or also called Do Nothing alternatives) evaluate what would happen if nothing were to occur. Any kind of reconstruction activity, even within the boundaries of the existing curb or right-of-way, would not fall under a No Build alternative.

Alternative E (No Build) would leave the existing SR 32 roadway as it currently is. No reconstruction of the roadway to meet the project’s purpose and need would be implemented. The existing roadway would

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The diagram and verbiage says to keep Main Street (SR32) as narrow as possible with an 80' ROW which includes parking and wide sidewalks. Clearly we can make the existing 70' ROW work. Do we need 18' sidewalks? 13' sidewalks gets us to existing 70' ROW taking no buildings.

Grand Junction Addendum, April 2009, Westfield-Washington Township Comprehensive Plan

[https://www.westfield.in.gov/egov/documents/1520949202\\_24351.pdf](https://www.westfield.in.gov/egov/documents/1520949202_24351.pdf)

*Westfield Preservation Alliance  
July 15, 2020*

continue to be congested further impeding traffic flow at numerous drives and intersection along the corridor. The SR 32 & Union Street intersection is expected to operate at LOS F during the design year (2042) with 95th percentile queue lengths exceeding 1,350 feet in both directions along SR 32 (Appendix A, A-53 to A-54). The queuing on the eastbound approach specifically results in backups into the Poplar Street roundabout and impacts access to the Riverview Health Hospital and the Westfield Intermediate and Middle Schools. This would further decrease the corridor mobility through the project area.

The referenced diagram and associated discussion is located on Page 139 of the Westfield-Washington Township Comprehensive Plan. The Comprehensive Plan states “The diagram at the right illustrates how an 80’ right-of-way provides sufficient space for 18’ sidewalks and four 11’ drive lanes. A turn lane at major intersections adds an additional lane.” Although the Comprehensive plan states that 80 feet of right-of-way would provide space for 18-foot sidewalks and four 11-foot travel lanes, it also states that a turn lane at major intersections would be added. The diagram also shows that the turn lane would be in addition to the four travel lanes. The addition of an 11-foot turn lane at major intersections would require a minimum of 91 feet of right-of-way at these intersections and the Comprehensive Plan does not account for the standard INDOT curb and gutter of 2’ 7”.

By incorporating the INDOT standard 2’ 7” curbs and minimum 8-foot sidewalks with the four 11’ travel lanes and 11’ foot turn lane from the Comprehensive Plan, the minimum right-of-way width would be 76’ and 2”. This would impact the existing utilities along the south side of SR 32 and require relocation. Accounting for the utility relocation along the south side of SR 32 with an anticipated 15’ utility corridor from the edge of curb, the minimum right-of-way would be 80’ 7”. Therefore, even with minimization efforts incorporated into the proposed reconstruction of SR 32 from the Comprehensive Plan, the proposed reconstruction would not be able to fit within the existing 70’ right-of-way.

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## MEETING MINUTES

**Location:** Virtual Meeting (Zoom)

**Date:** January 7, 2021

**Project Name:** State Road 32 Reconstruction (Des. No. 1801731)

**Project No.:** 2018.01349

**Invited Interested Party Attendees:** Briana Hope, Sarah Everhart, Ken Olson, Tanner McKinney (American Structurepoint, Inc.)  
John Nail (City of Westfield)  
Dr. Linda Weintraut, Bethany Natali (Weintraut & Associates)  
Beth McCord, Chad Slider (IDNR, Division of Historic Preservation and Archaeology)  
Patrick Carpenter, Kelyn Alexander (INDOT, Cultural Resources)  
Jennifer Beck (INDOT Greenfield District)  
Joshua Biggs, Mark Dollase (Indiana Landmarks)  
Judith Stanley Shuck (Adjacent Property Owner)  
Susan Boyer, Marla Ailor, Linda Nass (Westfield Preservation Alliance)  
Cindy Spoljaric, Mike Johns (Westfield City Council)  
Cliff Bradley (Adjacent Property Owner)  
Mike Shoup (Adjacent Property Owner)

**Additional Attendees:** Jake Gilbert, Joe Edwards, Scott Frei, Scott Willis (Westfield City Council)  
Elaine Hinshaw (Westfield Preservation Alliance)  
Gloria Del Greco  
Melody Jones  
Steve Parker

- 1) The meeting was held at 3:00 p.m., January 7, 2021 to review the preferred alternative for the State Road (SR) 32 Westfield Reconstruction project, the effects of the preferred alternative on historic resources, and discuss potential mitigation for those effects.
- 2) Sarah Everhart (Structurepoint) introduced the project team and reviewed the agenda for the meeting.
- 3) Sarah Everhart reviewed recent project updates:
  - a) A letter was distributed to interested parties on November 2, 2020 notifying interested parties that the anticipated federal funding from the project had been removed. Due to the removal of the federal funds, the project no longer is required to follow Section 106. State funding remains as part of the project, which requires the project to comply with the Indiana Historic Preservation and Archaeology Act.
  - b) An Alternative Analysis was completed on November 9, 2020 by INDOT, the City of Westfield, and American Structurepoint, Inc. The Alternative Analysis determined Alternative A was the preferred alternative.

- c) An appearance in front of the Indiana Historic Preservation Review Board has been requested for the January 20, 2021 meeting to introduce the project ahead of completing a Certificate of Approval (COA) application.
- 4) Mark Dollase (Indiana Landmarks) asked how much of the budget that the city is responsible for since federal funding has been removed from the project.
  - a) Jennifer Beck (INDOT) responded that the City of Westfield's portion of the project funding has not changed. The federal funding that was anticipated to be used was federal funding available to INDOT. SHPO had requested that the project team determine if state funds were going to be used in the project to move forward with the Dual Review process. INDOT examined their funding sources and due to the current circumstances, as well as the year that the funds were dedicated for in the interlocal agreement, they determined it would be best to move forward using state funds to meet INDOT's portion of funding.
- 5) Mark Dollase noted that it seems that all of the other alternatives were taken off the table when the City of Westfield removed federal funding from the project.
  - a) Jennifer Beck clarified that it was not the City of Westfield's decision to remove federal funding, but INDOT's decision. This decision was made by INDOT based on the need to manage the overall budget for the state and how to best allocate the funds available to them. The interlocal agreement between INDOT and the City of Westfield allows INDOT to use any funds available to them to meet their share of the project cost.
  - b) Sarah Everhart noted that when INDOT is making decisions on funding they must also account for the specific requirements that come with federal funding. Federal funding not only requires Section 106 and Section 4(f) during the environmental assessment, but also has specific requirements in the design and construction of projects.
- 6) Sarah Everhart stated that since federal funding has been removed the project, it is no longer following the National Environmental Policy Act (NEPA) and is now following the State Environmental Policy Act (SEPA).
- 7) Sarah Everhart noted that the project must meet the requirements of the Indiana Historic Preservation and Archaeology Act (IHPAA). The IHPAA requires projects that are funded in part of wholly by the State and that will alter, demolish, or remove historic sites or structures listed in either the Indiana Register of Historic Sites and Structures (State Register) or the National Register of Historic Places (NRHP) must be granted a Certificate of Approval (COA). This requirement does not apply to properties eligible for listing or to properties with submitted nominations to the State Register or the NRHP. Due to anticipated impacts to the NRHP listed Westfield Historic District; this project is required to obtain a COA.
- 8) Sarah Everhart reviewed how the COA process works. A COA application is submitted to the Indiana Department of Natural Resources (IDNR) Division of Historic Preservation and Archaeology (DHPA). Then the COA application is heard by the Indiana Historic Preservation Review Board at their next quarterly meeting who will then vote on granting the COA.
- 9) Sarah Everhart noted that a COA application for the project has not yet been submitted. The upcoming appearance at the January 20, 2021 Review Board meeting will introduce the project and receive the Board's initial comments. Based on the status of the project, it is anticipated that a COA application will be submitted for the April 14, 2021 Review Board meeting.
- 10) Beth McCord (IDNR-DHPA) noted that the January 20, 2021 meeting will be in-person with capacity restrictions. She asked that anyone wanting to attend this project's presentation wait to go into the room until about 2 pm.
- 11) Sarah Everhart reviewed the preferred alternative, Alternative A, and the draft renderings of the preferred alternative. The preferred alternative will have four travel lanes (two in each direction) with two dedicated left turn lanes (one in each direction) at the SR 32 and Union Street intersection. The draft renderings show buildings that will be removed outside of the historic district as red and the buildings

inside the historic district that will be removed as yellow. The renderings do have the private development called Union Square at Grand Junction shown between Mill Street and Union Street. This is due to the renderings representing the conditions at project completion and to show the overlap between the private development and this project. The buildings within the footprint of the private development would still be removed by that private development even if this project did not move forward. Those buildings will most likely be removed by the time this project begins construction.

- 12) Cliff Bradley (Adjacent Property Owner) asked why Jan's Village Pizza (108 S Union Street) is being removed; the rendering shows a green space where the building is now.
  - a) Sarah Everhart replied that based on the preliminary design there are conflicts between the sidewalk and the northwest corner of the building. There is a potential to avoid impacts to the building as the preliminary design is refined to a final design. The project assumes the worst-case scenario impacts for each alternative to make sure that all potential impacts are accounted for in the analysis. This ensures that accurate preparations and mitigation can be planned. If Jan's Village Pizza is not removed by the preferred alternative, then similar changes to impacts would happen for all alternatives that impact Jan's Village Pizza.
  - b) Mark Dollase replied that he had asked the same question previously and that was the same answer, so it is unacceptable that the design has not been further developed to have an accurate answer on the removal of the building.
  - c) Sarah Everhart replied that the project had been following the NEPA process, including Section 106, which required the evaluation of all alternatives before determining and refining the preferred alternative. It would not be feasible to complete detailed final designs for all seven alternatives, which would cost significantly more than what is budgeted for design in this project.
- 13) Cliff Bradley noted that he wanted to make sure that the removal of the building was not due to any future developments that would be built at the southwest corner of Union Street.
  - a) Sarah Everhart replied that the removal of Jan's Village Pizza is not due to any potential development, but the project team is aware that a developer is pursuing a potential development at that corner. The project approach has been that any buildings in conflict with this project's alternatives, whether being removed by private developments or not, would be accounted as an impact for this project.
  - b) John Nail (City of Westfield) added that there is also a structural component to removal of buildings at that corner. Erica's Place (102 S Union Street) is attached to Jan's Village Pizza. If the removal of Jan's Village Pizza can be avoided, the project team also will need to evaluate if the structural integrity of Jan's Village Pizza could be maintained if Erica's Place is removed.
- 14) Bethany Natali (Weintraut & Associates) reviewed the adverse effect of the preferred alternative on the Westfield Historic District. The preferred alternative will widen Main Street/SR 32 and demolish five (5) contributing commercial buildings, which will affect the setting of the district. The preferred alternative will also bisect the district and essentially separate the north and south sections of the district. Due to this, it is anticipated that the Westfield Historic District will likely no longer be eligible for listing in the National Register in its present configuration after completion of the project.
- 15) Sarah Everhart provided an update on the total number of buildings removed from the Westfield Historic District. The Alternative Analysis and the issued Finding of Adverse Effect indicated six (6) buildings would be removed by the preferred alternative, but it has been determined that there would only be five (5) buildings removed from the district. This change is due to a difference between the physical street addresses of the buildings compared to the street addresses listed in the National Register nomination. The accurate street address of Jan's Village Pizza is 108 S. Union Street, but is listed as 104 S. Union Street in the National Register nomination. Upon further review of the building descriptions in the nomination, it was determined that Erica's Place is described as 102 S. Union Street in the NRHP nomination and Jan's Village Pizza is the building described as 104 S. Union Street in the NRHP nomination. The total buildings removed in the Westfield Historic District for all alternatives would be



reduced by one building since Erica's Place only represents one contributing building in the district instead of two contributing buildings. Therefore, only five (5) contributing buildings listed in the nomination for the Westfield Historic District will be removed by the preferred alternative: 101 S. Union Street, 102 S. Union Street (Erica's Place), 103 S. Union Street, 104 S. Union Street (Jan's Village Pizza - accurate street address of 108 S Union Street), and 111 E. Main Street.

- 16) Joshua Biggs (Indiana Landmarks) asked for clarification on if the north half of the Westfield Historic District will be eligible for the National Register after completion of the project.
  - a) Bethany Natali responded that it is believed that the district as it is currently defined would not be eligible after completion of the project due to the removal of the buildings within the south section of the district. It is possible that the boundaries of the district could be redefined and the areas of significance reexamined. This is a potential mitigation option that will be discussed later in this meeting.
- 17) Joshua Biggs asked what would happen if a revised district/boundaries would not be eligible for the National Register.
  - a) Bethany Natali responded that if a revised district would not be eligible, then it would not be appropriate mitigation for the adverse effect. It would have to be further discussed with DHPA's survey registration staff to determine if revising the district would be a viable option.
- 18) Mark Dollase asked if DHPA had confirmed Weintraut & Associates determination that the district would no longer be eligible.
  - a) Bethany Natali responded that the determination that the smaller district may not be eligible was part of the issued Finding of Adverse Effect by INDOT. It has not been confirmed by DHPA.
- 19) Mark Dollase asked what the basis for this determination was because he finds it convenient for INDOT and the City of Westfield that the district would no longer be eligible.
  - a) Bethany Natali responded that INDOT determined the district would likely be ineligible after the completion of the project because the project would be removing five commercial buildings at the southwest and southeast corners of the historic district. One of the areas of significance listed for the district is commerce, so the removal of those five commercial buildings would impact the significance of commerce in the district. Additionally, the removal of those buildings will affect the setting and cohesion of the district. The remaining buildings within the district in the southern portion will be separated from the remaining northern portion of the district by a substantial gap.
- 20) Mark Dollase noted there are numerous historic districts in Indiana that are separated by divided highways or major streets that remain eligible for listing or listed in the National Register.
  - a) Patrick Carpenter (INDOT CRO) noted that part of the mitigation discussion is examining the existing nomination and possibly amending that nomination or completing a new nomination based on what the district will be like after the project. Additionally, the private developments that are going to be constructed along the south side of SR 32 will be something that effects the historic district. That discussion concerning the district would be carried forward to IDNR-DHPA and the National Register staff, so the commitment for the project would be to work with those agencies to determine what makes the most sense for the district after the completion of the project. The ineligibility of the district has not been determined, but is a very possible outcome.
- 21) Mark Dollase noted Weintraut & Associates recommendation that the district would be rendered ineligible is inappropriate and would rather look at the project as one that has significant impacts on a National Register listed district. Indiana Landmarks helped complete the listing of the district on the National Register and for the district to be dismissed because of an INDOT project is not appropriate.
  - a) Sarah Everhart replied that the district is not being dismissed and it is not something that INDOT or the City of Westfield wants. The project needs to account for potential effects, so that everyone involved is aware of the potential and mitigation is appropriately prepared for that potential outcome.

- 22) Mark Dollase noted that it appears there are areas where minimization could be implemented in the preferred alternative.
- a) Sarah Everhart replied that the Alternative Analysis examined minimization efforts that would reduce impacts within the Westfield Historic District. Multiple alternatives were examined to determine if the number of lanes required to meet the traffic need could be reduced. Those alternatives included Alternatives A-1, A-2, and A-3, which were developed by implementing minimization efforts in Alternative A. Due to the existing width of the roadway and the traffic need, the minimization efforts were determined to not reduce impact to the Westfield Historic District.
- 23) Chad Slider (IDNR-DHPA) said that he is concerned by the significant impacts of the project on the district and minimization efforts need to be thoroughly examined to ascertain if those impacts can be reduced.
- a) Sarah Everhart noted that minimization efforts can be reexamined, and minimization will continue throughout the project as the design is further refined. Additionally, she encouraged everyone to view the Alternative Analysis on the City of Westfield's website, which she will send the link to that website through email after the meeting.
- 24) Joshua Biggs noted that this project seems to be prioritizing traffic needs over the needs of pedestrians and small businesses. He said that the City of Westfield's priority should be keeping small businesses downtown and not moving the traffic, which stops at these small businesses through the downtown.
- 25) Cliff Bradley (Adjacent Property Owner) noted that he has owned his properties at the corner of SR 32 and Union Street for over twenty years. He has witnessed how terrible the traffic and parking are in downtown Westfield. He understands the need to widen the roadway and that at least one of his properties may be removed. Currently, traffic hampers downtown businesses and by removing a few buildings to improve the traffic the commerce in the area could be significantly increased. Pedestrians currently do not feel safe walking along SR 32. Widening the roadway and sidewalk, as well as providing a buffer between the two, will result in more pedestrians moving through the area to the old and new businesses.
- 26) Sarah Everhart stated that raised medians were incorporated into the design of the preferred alternative throughout the corridor. These raised medians would provide a refuge for pedestrians as they cross SR 32. Currently, there are no pedestrian crossings within the project area east of Union Street. The preferred alternative includes the addition of a mid-block crossing between Walnut and Cherry Street.
- 27) Sarah Everhart noted that the businesses within the removed buildings would be assisted by INDOT with the relocation of their business.
- 28) Joshua Biggs asked if the Westfield City Council would need to vote on this project for it to move forward.
- a) Councilor Mike Johns (Westfield City Council) responded that he is not sure how much input the City Council will have on the project, but will certainly be examining the cost of the project. They had previously been guaranteed that the project cost from the City of Westfield would not exceed 7.5 million dollars.
- 29) Councilor Johns stated that residents of Westfield want a walkable city that is friendly to pedestrians and bikers. Based on resources he has reviewed, it appears that with fewer roadway lanes, the more walkable the city can be. He believes that this project would not promote the walkability of downtown. He does understand that INDOT's priority is the mobility of traffic.
- 30) Jennifer Beck noted that INDOT's focus is mobility, but INDOT partnered with the City of Westfield to find the best solution for all of the project's needs. INDOT understand the serious impacts to the Westfield Historic District, but they do need to address the congestion on SR 32. The current average daily traffic volume exceeds the capacity of a two-lane road. East-west connectivity in the area is severely lacking and adjacent east-west corridors are already at capacity. The congestion along SR 32 is a major issue that not only is affecting SR 32 in Westfield, but also affecting other parts of SR 32.

INDOT has begun developing a project that will widen SR 32 from just east of Westfield to Noblesville due to the existing congestion issues.

- 31) Judy Shuck said that this project would have the greatest impact on her life out of everyone. She has lived at her property for over 70 years and this would greatly impact her community. The drivers along SR 32 who are unsatisfied with the congestion can choose a different route. She has seen reports that SR 32 needs to be made safe, but she has never seen anybody killed on SR 32 in downtown Westfield. Over the years, she has seen the amount of pedestrians decrease because over 60 buildings have been removed from Westfield. Noblesville has state roads going through their downtown area and have no problem. There are parking lanes on each side of SR 32 through downtown Westfield and if you removed those parking lanes you could have four lanes.
- 32) Sarah Everhart replied that if drivers of SR 32 were to take other roads, the congestion along those other roads would increase. Many roadways in Westfield and the surrounding area are already at capacity. Additionally, the other east-west corridors in the area are generally owned by municipalities who would then carry the burden of the increased maintenance of those roads. Many drivers along SR 32 recognize how congested the roadway is and have likely attempted to use other routes, but those routes were congested like SR 32.
- 33) Sarah Everhart noted that parking lanes were not included in any of the alternatives that would widen SR 32. The existing parking lanes are not wide enough to meet the required width of a travel lane for a state road. The existing roadway width of SR 32 is not wide enough for four travel lanes.
- 34) Judy Shuck suggested converting the existing roadway to two travel lanes with a center turn lane.
- a) Sarah Everhart replied that the amount of turning movements at Union Street is not the main factor causing traffic congestion. Alternative A-1 evaluated closing access from SR 32 to Union Street to determine if the number of travel lanes could be reduced by eliminating turns at the intersection. Due to the capacity of the roadway and the amount of through traffic at the intersection, it was not possible to reduce the number of required travel lanes to less than four.
- 35) Judy Shuck noted that the roundabout at Poplar Street is congested and emergency vehicles are not able to access the hospital.
- a) Sarah Everhart replied that the congestion at Poplar Street is due to the traffic backup from the intersection of SR 32 and Union Street, which this project is trying to address.
- 36) Gloria Del Greco asked why a road diet could not be applied to SR 32. She noted that a state road goes through Fortville, which is three lanes with a center lane, and pedestrians are able to cross the road.
- a) Sarah Everhart replied that Fortville had other east-west and north-south corridors that they could utilize to manage the traffic capacity without adding significant distance or travel time. SR 32 is a different scenario since it is a main east-west corridor in the area, and there are no viable options to bypass without motorists being diverted significantly north or south of SR 32.
- 37) John Nail noted that US 36 in Fortville has an annual average daily traffic total less than 10,000 vehicles per day, which is 50 percent less than the annual average daily traffic of SR 32 through Westfield.
- 38) Jennifer Beck said that INDOT recently implemented a road diet on US 40 through Greenfield and have since have had opposition from the community on road diets. Two other road diet projects have since been canceled. The annual average daily traffic for those roads were less than 10,000 vehicles per day. The vehicles per day along SR 32 through Westfield is of a significant higher magnitude than roadways where road diets or two/three lane roadways can be implemented. This is without accounting for the future traffic growth, which will continue to increase the vehicles per day along SR 32.
- 39) John Nail noted that when looking at federal highway guidance as well as other states' guidance, they are similar to Indiana in that road diets are most effective when prescribed to roadways with 8,500 to 10,000 vehicles per day. Places like California and Michigan have maximum limits of 15,000 and 18,000



vehicles per day for road diets. The vehicles per day along SR 32 are already significantly higher than those maximums and that number is expected to continue to increase.

- 40) Gloria Del Greco asked if the public was asked to provide input before any alternatives were developed or if the alternatives were developed then presented to the public as their choices.
- a) Sarah Everhart replied that there were preliminary alternatives developed based on the traffic volumes in the area. These were Alternatives A, B, and C. A public meeting was held around the middle of 2019 that presented those preliminary alternatives and the public was encouraged to provide comments, ask questions, or suggest alternatives for the project. Preliminary alternatives need to be presented to the public to initiate feedback. Comments that were received from the public meeting were incorporated into the environmental analysis, as well as the development of the design. Additionally, a Community Advisory Committee was formed which invited representatives from the Westfield Chamber of Commerce, Westfield Preservation Alliance, Riverview Hospital, Westfield Schools, local businesses, and emergency services to participate. The preliminary alternatives were presented to those who attended the meeting and feedback on the alternatives was requested, as well as suggestions for other alternatives. Additional coordination was completed with emergency services on response times. An important factor to consider is the effect that congestion along SR 32 has on emergency services response time, which will continue to be affected due to the lack of other east-west corridors to the hospital.
- 41) Cliff Bradley noted he used to live north of downtown Westfield and that relying on drivers to find alternative routes will result in more traffic along rural routes. Those roads are not designed to handle that amount of traffic, especially considering that a majority of those roads are typically more narrow and do not include pedestrian facilities. This would result in more accidents and he does not see any way around widening SR 32.
- 42) Bethany Natali stated that the effects of the project are being taken very seriously and determining adequate mitigation is important to the project. It is important to consider placemaking and the project team does recognize that Westfield has important history. There are opportunities through mitigation to find ways to enhance the historic district and allow people in the community who may be unfamiliar with the history to understand it better.
- 43) Sarah Everhart reviewed the idea of creating a “Walk Westfield” phone app. An example of the phone app was shown in the presentation (attached). The phone app would incorporate information from the Westfield Historic District’s National Register nomination, as well as be enhanced with additional information. Users of the phone app could select areas on the map or possibly scan a QR code at locations in the city to pull up historic information.
- 44) Bethany Natali indicated that the phone app could include the district’s current areas of significance (commerce and architecture) and include information on Quaker heritage, as well as the Underground Railroad. This could also be used for buildings that are no longer there. It could provide an opportunity to interact with the past built environment of Westfield.
- 45) Marla Ailor (Westfield Preservation Alliance) asked who would be responsible for paying for this mitigation option.
- a) Sarah Everhart replied that it would be determined by INDOT and the City of Westfield on how funding the mitigation would be accomplished.
- 46) Marla Ailor asked who would be the person responsible for the information, as well as for how long.
- a) Sarah Everhart replied that it has been discussed that the City of Westfield would manage the phone app, but they would consult with Westfield Preservation Alliance and the Westfield Historical Society. The information that is put in the phone app could also be given to IDNR-DHPA and the Westfield Public Library.
- 47) Marla Ailor noted that she was concerned about the use of a QR code and what would happen if support for QR codes went away in the future.

- a) Sarah Everhart replied that the QR code is an example of what could be used. If it was used some alternative for pulling up information would be built in, for example numbering the historic buildings and physically labeling them. The phone app would be designed so that it would not require a QR code or reference number to access information. If the QR code is not desired then it does not have to be incorporated into the app.
- 48) Marla Ailor said that it would better if a historian or librarian was given the job of maintaining or updating the app. It does not feel like the phone app is a great option, and the details were not considered.
  - a) Patrick Carpenter replied that the intent of the phone app idea was to have something that communicated the history of Westfield and the sense of place, especially in an area with continued growth and change. It is important to keep in mind that the goal of this meeting is to receive feedback on these initial mitigation ideas and on the kind of mitigation that is appropriate. The project team can only start the conversation on appropriate mitigation because the members of the community know what is needed or important. Any mitigation that is decided on would be included as a commitment in the COA application. He also noted that INDOT has funded preservation positions in the past.
- 49) Judy Shuck noted she does presentations on Westfield's history including information on the Underground Railroad and Quaker heritage. She could provide that information to the project team.
  - a) Sarah Everhart replied that any historical information is welcomed by the project team.
- 50) Sarah Everhart noted that a historical route or trail could be established, which could be supplementary to the phone app or other mitigation pursued. It could include stops near historical locations with signs including important historical facts.
- 51) Judy Shuck noted that when a historic building is still present it can help to build the conversation around the history that took place there, but when a building is no longer there it can be hard to have that conversation.
  - a) Sarah Everhart indicated that is a great point to consider. There are some ways that can be addressed. For example, including historic photos of locations on signs or the phone app if it is pursued.
- 52) Joshua Biggs noted that he supports the potential mitigation ideas that are being discussed in the meeting, but with this large of an adverse effect the mitigation needs to be more substantial. Buildings are being demolished, and the mitigation needs to be more physical instead of representational. This could include relocating those historic building that are proposed to be demolished. Other possibilities include a programmatic agreement that requires a building in the historic district be restored for every historic building removed or maybe a preservation ordinance with a preservation commission to protect the remaining buildings.
  - a) Sarah Everhart replied those are good points and mitigation ideas. She noted there are existing grants that help renovate local businesses and a similar approach could be used. Another option is the use of local ordinances to account for new developments and requiring a specific type of façade to be incorporated.
- 53) Sarah Everhart said that it is important to keep in mind that these historic buildings are significant within the context of the historic district and relocating the buildings to a location within or near the historic district would help maintain the areas of significance. The buildings would most likely need to be relocated to a city owned property.
- 54) Patrick Carpenter noted that INDOT and the City of Westfield are committed to providing mitigation that is worthwhile and robust to address the adverse effects of the project.
- 55) Cliff Bradley stated that he would like to see the historic building he owns be moved somewhere in Westfield, especially north of SR 32 where the rest of the historic district is. The building could possibly be relocated to Asa Bales Park and establish a place where the public can appreciate historic buildings.

- 56) Mark Dollase asked if the park at the northwest corner of SR 32 and Union Street could be used to relocate one of the historic buildings. This would keep a building in the historic district and within the commercial area of the district.
- a) John Nail said that park is Hadley Park and owned by the city.
  - b) Gloria Del Greco noted many people paid for memory bricks to be placed in Hadley Park and those bricks would need to be relocated.
- 57) Gloria Del Greco noted she would want to see the historic buildings relocated west of Judy Shuck's house (209 W. Main Street) where there is open space. That area could then be added to the historic district and include Judy Shuck's house, which should be in the historic district.
- a) Sarah Everhart noted it could be a potential relocation option. There would still be a significant gap between those buildings and the rest of the historic district, so it would need to be examined further if the historic district limits could be moved that far west.
- 58) Marla Ailor noted that everyone, the project team and interested parties, should work together to determine what is appropriate mitigation. If interested parties think that the buildings should be relocated and is a real solution, the City of Westfield should want to do that mitigation and pay for it, no matter the cost.
- a) Sarah Everhart replied that is the goal of today's discussion and there is no intent to eliminate mitigation ideas or rule them out. The intent to discuss these mitigation ideas and variables, so that there is transparency on what would be the possible outcomes of mitigation.
- 59) Patrick Carpenter asked the Westfield Preservation Alliance, Indiana Landmarks, and any other interested parties to meet after the meeting to further discuss and develop potential mitigation ideas that they think are appropriate. Comments and ideas from their meeting can then be brought to the project team to discuss the feasibility.
- a) Cliff Bradley noted that he liked the idea of a discussion between interested parties.
- 60) Marla Ailor noted that it was frustrating the meeting invitation was to attend the meeting and hear the project team's best ideas. Interested parties were not asked to bring ideas.
- a) Patrick Carpenter replied it was not the intent of the invitation to convey that message. The intent of this meeting was to be a starting point for discussing mitigation with interested parties. This meeting is not the end of discussing mitigation, and mitigation will continue to be discussed in the future.
- 61) Jennifer Beck noted that there are many young families in Westfield. She remembers from her childhood she visited a park that had playhouse size buildings that kids could walk in between. A possible mitigation option could be reusing the materials from demolished historic buildings to rebuild those historic buildings on a miniature scale. The historic district could be replicated at that scale to represent the configuration of historic Westfield.
- 62) Melody Jones noted she previously worked with the Parks Department on potentially moving a historic building and researched it for approximately a year. Moving the building, besides dealing with overhead utilities, was a feasible option. The Westfield Historical Society was able to preserve a historic cabin located outside of town and were hoping to reconstruct that cabin on city property. It could be possible to work with the Parks Department to include that cabin and the buildings from the historic district in one area. That area could also incorporate a walking tour and take advantage of current technology to attract the public.
- 63) Mark Dollase asked if the comment period for potential mitigation could be extended to 30 days from this meeting and have comments due by February 8, 2021.
- a) Sarah Everhart replied that the comment period could be extended to February 8, 2021.



- 64) Mark Dollase noted Indiana Landmarks has worked with other cities in the state to establish local preservation review boards. He encourages that some form of public policy mitigation be implemented if the historic district is going to be rendered ineligible.
- 65) Mark Dollase noted that it is important to consider that if the historic buildings are going to be relocated to an area like Asa Bales park, there will need to be significant maintenance costs accounted for. It could be a possibility that those historic commercial buildings are relocated to an area where they could continue to be used commercially.
- 66) Bethany Natali reviewed using public art, possibly in the form of a historic mural, as a form of potential mitigation. The public art would be focused on the Westfield Historic District, but could be expanded to include additional Westfield history. The goal of the public art would be to create that sense of place or be a placemaking feature.
- 67) Sarah Everhart noted that if public art were pursued then public feedback would be sought and incorporated into its development. The opportunity to provide feedback would open to the general public.
- 68) Chad Slider noted the potential mitigation ideas in the presentation are great options, but he thinks they should be supplemental to a more substantial mitigation option.
- 69) Sarah Everhart reviewed revising or completing a new National Register nomination for the Westfield Historic District.
- 70) Bethany Natali asked Mark and/or Chad if it could be possible to expand the areas of significance for the Westfield Historic District along with revising the district boundaries.
- a) Mark Dollase noted it has been done before, but was typically on a historic district with an older nomination. Westfield Historic District's nomination is only a few years old.
  - b) Chad Slider replied that Paul Diebold who handles the register nominations for DHPA would need to be consulted on that. He agreed that there have been districts in the past that have had amendments to their boundaries or areas of significance, but were districts with older nominations.
- 71) Chad Slider noted Paul Diebold would also need be consulted on if the effects of this project would result in an ineligible district.
- 72) Sarah Everhart reiterated that the project team would like interested parties to meet separately to further discuss and develop potential mitigation ideas that they think are appropriate. Comments and ideas from that meeting can then be brought to the project team to discuss the feasibility.
- 73) Sarah Everhart reviewed the next steps of the project including the extension of the comment period to February 8<sup>th</sup>, the appearance in front of the State Review Board on January 20<sup>th</sup>, and the future submittal of a COA application for the April 14<sup>th</sup> State Review Board meeting.
- 74) Mark Dollase asked if a Memorandum of Agreement (MOA) that everyone is comfortable with would be able to be completed by the beginning of March to be included in the COA application.
- a) Patrick Carpenter replied that since the project is following the state process, there will not be an MOA. It is anticipated that the mitigation plans will be developed with interested parties and then included in the COA application as commitments. It is hoped that the overarching mitigation plan can be developed enough to be included in the COA application, but with a note that specific details would be further developed with interested parties.
- 75) Mark Dollase noted that some of the mitigation ideas, like a preservation ordinance, would need to be discussed internally by the City of Westfield or INDOT. He was not sure if there would be enough time for that to be completed before submitting the COA application in March.
- a) Patrick Carpenter replied if the overall mitigation ideas are not agreed upon by interested parties or if INDOT and the City of Westfield need more time to confirm the feasibility of those ideas, then the COA application would most likely be pushed to the July 2021 State Review Board meeting.

- 76) Patrick Carpenter noted that another interested parties meeting will be scheduled for the week of February 8<sup>th</sup> for everyone to reconvene after comments are submitted by interested parties. Depending on how that meeting goes and how much mitigation is decided upon, it can then be determined if the COA application should be submitted in March.
- 77) Chad Slider noted that the potential sites for building relocations could be shared with Paul Diebold to receive initial feedback concerning the proximity of those locations to the historic district and if they would be close enough to maintain the historic district.
- 78) Judy Shuck noted that her house has passed the state review for individual listing on the National Register and that nomination is now in Washington D.C. for review.
- 79) Sarah Everhart noted a link to the City of Westfield's website where the Alternative Analysis is posted will be emailed to interested parties and asked that interested parties review the report. The Alternative Analysis clarifies the minimization efforts that were examined and why Alternative A was determined to be the preferred alternative.
- 80) Sarah Everhart asked for any additional questions, thanked everyone for their participation, and adjourned the meeting.

#### **ACTION ITEMS**

- A Meeting Summary will be distributed including an extension to the comment period. (**The comment period has been extended to Monday, February 8, 2021**)
- An additional meeting will be scheduled to continue the discussion on mitigation (**An interested parties meeting has been scheduled for Thursday, February 11, 2021**)
- Westfield Preservation Alliance, Indiana Landmarks, and other interested parties will meet amongst themselves, if possible, to further discuss potential mitigation ideas or develop other mitigation ideas that they think are appropriate.

The minutes of this meeting as described above represent the writer's interpretation of the discussions of the meeting. If your interpretation differs substantially, or if there are items that were overlooked, please contact me at (317) 547-5580 or severhart@structurepoint.com to revise the record.

Very truly yours,  
American Structurepoint, Inc.



Sarah J. Everhart  
Environmental Specialist

SJE:

Enclosures

Comment	Response
<p>1. Will a landscaping plan be included in this project? <i>Melody Jones</i></p>	A landscaping plan will not be a part of this project.
<p>2. Why are we building a five lane road, when INDOT is teaching road diets for community safety? This road will split the town and just make a freeway through the middle of the town. This will not improve Westfield, but destroy it. I learned all this at an INDOT training. <i>Gloria Del Greco</i></p>	Thank you for your comment. Please refer to items 19, 26, 47, and 51 in the "Response to Consulting Parties" distributed on September 4, 2020. <i>This comment was also addressed during the meeting. See items 36 through 39 in the meeting minutes.</i>
<p>3. Is the Carnegie Library going to be demolished? <i>Gloria Del Greco</i></p>	No. It is on the north side of SR 32 and is not impacted by the preferred alternative. <i>—Answered in chat by John Nail</i>
<p>4. The intent to remove 2 corners from the 1834 town foundation cross streets is problematic <i>Linda Nass</i></p>	Thank you for your comment. INDOT and the City of Westfield intend to complete robust mitigation for this project's effect on historic resources and consultation with the Division of Historic Preservation and Archaeology, Indiana Historic Preservation Review Board, and interested parties.
<p>5. We should consider traffic mobility. Safety of vehicular, pedestrian and biker traffic not improved by wider roads. Over a year ago we asked for traffic numbers in several locations, but have not received those. We asked to see those measured not estimated. <i>Linda Nass</i></p>	Thank you for your comment. The Traffic Operations Analysis completed by American Structurepoint, Inc. on May 30, 2019 was provided to consulting parties in Appendix A of the Response to Consulting Parties distributed on September 4, 2020.
<p>6. Why is the purpose to run everyone through Westfield. I thought you wanted people to come to town. I believe the Indiana State Department of Health would disagree with this design. Were public meetings for suggestions held before the alternatives were designed, or were these alternatives designed and then brought to the community for approval? <i>Gloria Del Greco</i></p>	<i>Comment addressed during meeting. See items 36 through 40 in the meeting minutes.</i>
<p>7. Who do I talk to about business impact and displacement? <i>Cliff Bradley</i></p>	Please contact the INDOT Project Manager, Jennifer Beck.
<p>8. I look at 146<sup>th</sup> Street that was to ease traffic and if you travel it the wider it got the worse the traffic congestion got. <i>Gloria Del Greco</i></p>	Thank you for your comment.



- 9.** Please note Cliff is the only commercial business owner that is on the zoom meeting. Cliff has said he understands the need for this. The other commercial buildings south of Cliff's properties spoke out against having their properties included in this district, but others in the Westfield community were more vocal at the meeting with Historic Preservation. Today you are hearing only a few people complaining. They do not live in downtown or own property that is affected. I recommend moving the district north of 32. Please look at Old Friends Cemetery Park. Also historic marker in Asa Bales Park.

*Melody Jones*

Thank you for your comment on mitigation for the Westfield Historic District.

- 10.** I would really like to see buildings relocated in/near district whenever possible.

*Melody Jones*

Thank you for your comment on mitigation for the Westfield Historic District.

- 11.** The Westfield Library and the park department talked about doing this [creating a walking tour/app of historic areas of Westfield] in conjunction with the Historical Society. The library was going to apply for a grant. It would be based on an app. Not sure where the funds came from. Perhaps the library could be the partner in charge.

*Melody Jones*

Thank you for your comment on mitigation for the Westfield Historic District.

- 12.** National Environmental Policy Act regulations on the Council on Environmental Quality (Section 1508.20) Is there a parallel section within state documents for the definition of "mitigation" that we should use? When do we address "avoid", "minimize", and "mitigate" in this process?

*Linda Nass*

The State Environmental Policy Act does not specifically require or define "avoid", "minimize", and "mitigate". Although this project is following the State Environmental Policy Act, the fundamental characteristics of mitigation from the National Environmental Policy Act are being applied. Avoidance and minimization efforts have been applied throughout the development of the project and will continue to be applied moving forward. Mitigation for historic resources is being addressed through the current consultation with interested parties. Mitigation will be stipulated through conditions of the COA.

- 13.** Would it be possible to move them [relocated buildings] to the west of Judy Shuck's property, where they tore down all those houses?

*Comment addressed during the meeting. See item 57 in the meeting minutes.*

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*Gloria Del Greco*

**14.** Please provide us with stats & studies on the safety of such a road design.

*Linda Nass*

Thank you for your comment. The Traffic Operations Analysis completed by American Structurepoint, Inc. on May 30, 2019 was provided to consulting parties in Appendix A of the Response to Consulting Parties distributed on September 4, 2020. Please refer to items 14, 20, 30, 35, 36, and 38 in the "Response to Consulting Parties" distributed on September 4, 2020, which further discusses the traffic analysis.

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January 19, 2021

Sarah Everhart  
American Structurepoint, Inc

cc: SR 32 Reconstruction Project- State Review Board

Hello all,

I am Cliff Bradley, owner of 102/108 S. Union St Westfield, In 46074, currently leasing to Erika's Place & Jan's Village Pizza. My wife & I bought the property in 1999 and have heard the talk of the need to widen SR 32 for quite some time. Our property at 102 S Union is in the designated reconstruction zone & possibly 108 S Union.

Our building at 102 S. Union has great historical significance, as it is one of the oldest buildings in Hamilton County as well as being continuously occupied for over 150 years. It is a social focal point in downtown Westfield, along with being a continuous employer.

Our hopes for the property at 102 S. Union would be that it's moved to another location in a historical district of Westfield. We would also hope that 108 S. Union could remain, possibly by adjusting your turn angle?

With all this in mind, I still believe that Westfield needs this project to go through. SR 32 is the main SR going east to west in Hamilton County. With the growth not only in Westfield, but also between Carmel and Noblesville, the widening of SR 32 is necessary to handle the traffic flow with all this growth. SR 32 is the most direct route, so I see no other alternative. There should be a lot of economic growth due to the smoother flow through town. This will also force an upgrade to the essential utilities, something thats been needed for a long time.

That's why I'm in favor of the project. I hope that the historical significance of 102 S. Union will make it mandatory for it to be moved to another location in the historical district of Westfield.

Sincerely,

Cliff Bradley



## Everhart, Sarah

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**From:** Scott Willis <swillis@westfield.in.gov>  
**Sent:** Thursday, January 28, 2021 8:14 AM  
**To:** Everhart, Sarah  
**Cc:** Scott Willis  
**Subject:** SR-32 Expansion Project

Sarah,

I would like to take a moment and voice my support for the SR-32 expansion project. SR-32 is the northern boundary of my district which runs from the city's eastern border at Gray Road to downtown Union Street. I have had numerous conversations with constituents since taking office last year and I can say emphatically that it is a much needed and desired project for our community.

SR-32 is a critical artery for our city and the downtown area has been a choke point for over a decade. There is a reason businesses have not been successful in the downtown area and I believe the congestion and lack of mobility downtown plays a significant role in it. This project should eliminate the bottleneck and open up our downtown area for commerce.

We do have a few important buildings along this corridor that need to be saved to include the old bank and library on the north side of the road and Judy Schuck's home on the south side near the Speedway Gas Station. I am under the impression that the plan will not impact these structures. While it would be nice to save as many buildings as we can, not every old building has historical significance worthy of saving to include the building on the southeast corner of Union and SR-32.

I have been informed by constituents of mine that the President of Westfield City Council has made a public statement during one of your recent meetings that a majority of the Council is not in support of this project. While I can't speak for other councilors, I can confirm two things. First, as representative of District 1, I am absolutely in support of this project. Second, there has been no public discussion by City Council on this project and while Councilman Johns may have had one on one discussions with individuals, the Council as a whole has not formalized an opinion either way.

Feel free to reach out to me if you have any questions.

Respectively Submitted,

**Scott A. Willis**

Westfield City Council, District 1

swillis@westfield.in.gov

(317) 431-6961

## Everhart, Sarah

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**From:** Melody Jones <meljones1102@gmail.com>  
**Sent:** Tuesday, January 19, 2021 2:12 PM  
**To:** Everhart, Sarah  
**Subject:** Main Street or SR 32 in Westfield

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hello Sarah,

I live at 211 Mill St, Westfield, which is a block off of Main Street. I have lived on this street since 1984. So I think next to Judy Shuck I have the most years of living in this area. I did attend the zoom meeting on January 11th and would like to request that I be added to the mailing list for this project.

I would like to go on the record to say I **could not disagree** with Judy, Mark Dollase or Josh Biggs more. I understand Judy wants to save her house. And from what I see you are doing that. But has anyone noted, that none of the other property owners are in disagreement that this project? It needs to happen. Cliff Bradley is not against the project and I think to save face with the preservation people he brought up moving the building he owns, that was Erica's. The people who say they represent Westfield is a small group that does not like any change. If they had their way we would close down and not make any improvements or allow anyone new to move here. The buildings they are asking to preserve are, in my opinion nothing to save: a block building, a stone building built in the 70's, a wooden building that is falling apart which is connected to brick building that is also falling apart. Obviously the owners are not invested in our downtown.

I worked for the City of Westfield for 10 years as the Park Director. The City made the most improvements and highlighted our history for the first time. We developed the Old Friends Cemetery Park and added 8 interpretive signs that tell the Quaker story. We hosted Voices From the Past; a guided walking tour in downtown that highlighted the Anti-Slavery Cemetery and Old Friends with first person interpretation. We restored the John Rhodes historical marker that had been removed and left to decay in a barn. We highlighted the history behind all the City Parks on the City's website and worked with all the Westfield Elementary Schools to share this information as part of their curriculum. For over a year we worked to put the plans in place to move the Estes House (located next to Union Bible College) in order to preserve it, only to have the Friends Church stop the plan. These are the same people (Judy) that are complaining today that the City is not doing anything to tell our story. They are wrong.

I walk our downtown often, and it is awful. The sidewalks are 3 feet wide and falling apart. The businesses for the most part do very little to keep up the exteriors of the buildings. It is ugly. Your plan is a welcomed improvement. With traffic calming design built in (roundabouts, street landscaping, pedestrian refuge islands and wide sidewalks) the vehicular traffic will slow down. People will be out on the street. This is not good for anyone, especially the businesses. Now everyone stays away.

Sorry for going on so long. I want you to know more people in our community are in favor of the SR 32 plan than are not. Please don't listen to only the complainers. Most people do not know you are working on this. I am a real estate agent and I have two clients affected by this project that had no idea. Michael and Donna Shoup on Main Street and Julie Sole on Mill Street.

Please if you are entertaining making any changes please listen to everyone. What are the next steps?

Thank you for taking the time to read this.

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## Everhart, Sarah

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**From:** Julie Sole <jaes125@yahoo.com>  
**Sent:** Wednesday, January 20, 2021 9:28 AM  
**To:** Everhart, Sarah  
**Subject:** Re: Main Street or SR 32 in Westfield

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hello Sarah,

I am in total agreement with Melody Jones. After moving to Westfield in the early 1980's I purchased a home in the downtown. I have now lived on Mill Street for 27 years and have been active in many aspects of our downtown since becoming a resident 40 years ago.

It is my belief that the plan to improve SR 32/Main Street is imperative to the survival and the ability to prosper for this downtown. I feel that many of the naysayers have other issues with the City and are using this platform to speak out. I am sure Mrs. Shuck is fond of her home and her place in history; however, rerouting a state road and halting much needed improvements in the downtown to save one structure will not be beneficial to the financial health of this community.

The history of Westfield is rich and I am proud of that history. I was a founding member of the Westfield Historical Society, but I am also a pragmatic resident that does not want the heart of our downtown to languish due to a vocal minority. Improvements can happen while still preserving history in other ways than halting plans that have been a part of this community for many years.

I will state that my investment in my home is due to the fact that I love this community and chose to live in the heart of downtown that I and many others have worked so diligently to enhance.

Please add me to your list of interested persons as I would like to be updated.

Thank you,

Julie Sole

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To: Sarah Everhart  
American StructurePoint

Sarah,

My name is Dan Moyer, I am the President of the Downtown Westfield Association and Grand Junction Task Group. For the past 3 years, our Board of Directors at Downtown Westfield Association (DWA) has been looking forward to the final plans for the improvements to State Road 32 which will improve the traffic flow through Downtown Westfield and improve the sidewalks and functionality of movement in and around the area between Poplar and East Streets on 32. We are also excited about the improvements to Jersey Street.

The Grand Junction Task Group has seen many presentations and has had many discussions with developers over the past 3 years that all include the improvements to State Road 32. All of these developers look forward to getting the project done as to improve the aesthetics and functionality of traffic flow through downtown.

The DWA and Grand Junction Task Group have for years looked forward to these improvements as presented in the current version by Structure Point as the best plan for Downtown and its future growth.

With the current plans for a beautiful development on the south side of 32 between Union and Mill Streets, and the development of the Grand Junction Plaza and the future developments on Park Street, Jersey Street and the Grand Millennium Project on Poplar Street, it is imperative to get the State Road 32 project approved and built ASAP.

The fact that the 32 project affects buildings on the south side of 32 is the best design, and has been vetted and approved for the past few years. The buildings affected are of no real historical significance. The owners are all willing to move or have sold to developers. The north side of 32 has a couple historical buildings which in the design of 32 are not affected.

The Downtown Westfield Association and the Grand Junction Task Group fully support the design of the new 32 project that is being presented today by StruturePoint and ask that the Indiana Historic Preservation Commission approve this project and know that the truly historic buildings in Downtown Westfield are being preserved as they are on the north side of 32.

Thank you,

Daniel L. Moyer

## Everhart, Sarah

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**From:** Dave Sobczak <dave@sobczakconstruction.com>  
**Sent:** Tuesday, January 19, 2021 5:14 PM  
**To:** Everhart, Sarah  
**Cc:** Stacey Sobczak; sam@sobczakconstruction.com  
**Subject:** [FWD: Main Street - SR 32]

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

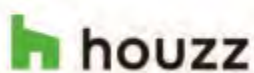
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Good afternoon Sarah,

We have and hope to continue to have time and money invested in the growth of the downtown Westfield area. We feel that improving that portion of SR 32 will most certainly serve the community and surrounding areas well. Right now traffic is a mess AND it looks bad. With the Grand Junction Park coming along and proposed new developments it has attracted, this is a needed step in the right direction.

Sincerely,

David S. Sobczak  
Sobczak Construction Services, Inc.  
(317) 844-9576  
visit us on the web at [www.scscustomhomes.com](http://www.scscustomhomes.com)  
or [www.sobczakconstruction.com](http://www.sobczakconstruction.com)



## Everhart, Sarah

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**From:** Jim Ake <jtake1812@gmail.com>  
**Sent:** Wednesday, January 20, 2021 11:16 AM  
**To:** Everhart, Sarah  
**Subject:** Westfield Main Street/SR32 Project

Dear Sarah,

My name is Jim Ake. I am in favor of and support the Main Street/SR 32 Structurepoint project as designed. I currently am a member of the Westfield Board of Public Works, the President of the Westfield Economic Development Foundation , Member of the Chamber of Commerce and was the 2020 first ever Chamber Legacy Award Winner for a lifetime of achievement relating to Westfield, a Rotary Club of Westfield member and their Foundation Chair and past Treasurer. I served as President of the Westfield City Council and was serving at the time this project came forward and supported it as did our Councilors.. I also volunteered and served on the Grand Junction Task Group that studied this project and developed the concept plan which is what Structurepoint is presenting. The Grand Junction Task Group was open to anyone living in Westfield and also held Public Engagement Presentations which received broad community support. Additionally, I facilitated a group of homeowners associations called Westfield Community Association Network providing home owner associations with pending city actions and getting input on projects like these. Again, this group too, was very supportive and represented a large number of Westfield Homeowners. .

Westfield is a fast growing prosperous community that has a failed downtown core with a state highway running through it. The number of cars going through our city will only increase making things worse. The folks advocating for Preservation are small in number and their motives tend to be self serving and ignore the greater public interest. Their narrative is compelling but their purpose does not match the needs and sentiments of the community at large. There are valid preservation needs in our community, These have been ignored . The Estes House restoration and preservation would be a good starting place. How about the circa 1830's log cabin that was found in Westfield. dismantled and is stored on City property. It needs to be reassembled and restored. I personally donated money for the disassembly and for storage of this building by our Historical Society. Old Friends Cemetery was left to ruin when the City of Westfield stepped in to revitalize and restore this sacred part of our past. We respect our history. We tell our history, **We have preserved our history that has value. Ask yourself why would you come to Westfield to see and tour these few falling down structures the Preservationist say are so historic? There is nothing to see or do or view.**

Now we wish to make history. We can solve our traffic issues creating a vital and vibrant downtown, with streetscapes, smooth wide sidewalks, cafes, unique architecture and with a traffic calming design. I wholeheartedly support this project. So does our Comprehensive Development Plan for our city which involved hundreds of our citizens who volunteered and gave input to this process. .

I appreciate the task before you. I trust you weigh individually the present value of the few structures involved against the benefits of a safe, quiet, traffic calming new Main Street with attractive amenities , job opportunities, business growth, safe building structures, and a livable, walkable city core.

Thank you for your time.



February 20, 2021

Dear Sarah,

My name is Joe Plankis. I am in favor and support the Main Street/SR 32 Structurepoint project as designed.

I am currently President of the Westfield Redevelopment Commission (and member for approximately 10 years), Secretary of the Westfield Economic Development Commission, and a member of the Westfield Chamber of Commerce,

I served previously as the longest serving board member (12 years) of the Centennial Home Owners Association and held three of the four officer positions including President. I was elected to the HOA board in 2007, when the developer turned over the management of the HOA to the homeowners.

I was also a member of the 16-person Steering Committee, who were selected to lead the efforts to update the Westfield-Washington Township Comprehensive Plan (Comp Plan) from 2005-2007 at which time it was approved in February of 2007 by the Town Council as Town of Westfield Resolution 07-06. I was selected as Chairperson of the Steering Committee at the start, by the other committee members. I also served as a Town Councilor from 2007 until Westfield became a city on January 1, 2008.

Starting on January 1, 2008, I began my service as Westfield's first Economic Development Director, and served from 2008 until March 1, 2010 when I retired. During those two-plus years, I also created the Westfield Economic Development Foundation which is still operating today.

One of the organizations, of which I am also a member, is the Westfield Washington Historical Society and Museum, to which I made a personal donation to disassemble and store the 1830's log cabin that was recently found in a barn in Westfield. I do believe in preserving those historical buildings that are worthy of saving.

With that background information, you can see that I have been closely involved with updating the City's Comprehensive Land Use Plan (Comp Plan) and then assisting the City Council and Mayor Cook with the implementation of that updated Comp Plan. It was a participative, bottoms up approach with over 275+ persons taking part in that effort over a two-year period.

Right from the start, the greatest effort was focused on Downtown Westfield which everyone knew needed immediate help. **Chapter 3: Downtown**, of the Comp Plan was considered the starting point.

**A Vision** was established that reads as follows: "Vision: Downtown Westfield is a village destination with community pride, unique businesses, outside eateries, busy with pedestrian traffic and families. It has an identity based on its Quaker roots and Underground Railroad heritage." (Comp Plan page 68).

In addition, "A healthy downtown promotes a sense of place, and is embraced as a central part of the community vision." (Comp Plan, P.68)

**Traffic Flow:** Even in 2005, traffic flow on SR 32 was an issue. This issue was recognized as a major problem during the development of the Comp Plan, and it is much worse today with backups to the west from Union Street, all the way to US 31 at certain times of the day and backups from Union Street to Carey Road to the east and sometimes even past Carey Road. That was re-confirmed recently during a conversation with one of the business owners on SR 32. It is untenable to leave the situation as it is today. Improvements must be made. (Comp Plan, P.70-71).

The need for Traffic Flow improvements was also addressed with a strong recommendation to “The town needs to work with the Indiana Department of Transportation (INDOT) to seek cooperative planning efforts for this area.” (Comp Plan, P. 73-74) That co-operative effort is ongoing between the City of Westfield and INDOT.

**Promote Activity:** “The plan for downtown should include a community gathering space such as a park or plaza where downtown events can take place”. (Comp Plan, P.74). This very vital part of the plan is currently under construction as the Grand Junction Plaza. It has already stimulated plans for \$69 million in private investment with the Union Square PUD and their recent addendum currently being requested of the city by the developer, Old Towne Companies.

**Realize Redevelopment Opportunities:** “SR 32 (south side): The possible expansion of the highway may produce opportunities to redevelop property farther back from the road.” (Comp Plan P. 75.)

**Previous Plans:** “Prepare and adopt a traffic management plan for downtown, partner with INDOT as necessary. Establish a public/Private partnership to enhance the downtown. Consider forming a redevelopment commission to spearhead downtown improvements”. (Comp Plan P. 78).

During the 2-year process of creating the update to the Comp Plan, many discussions were held concerning SR 32. It was a general consensus that there were a number of buildings on the north side of Main Street (SR 32), that were worth saving such as the old bank building and the former Carnegie Library. It was felt that major redevelopment should be focused on the south side of SR 32, especially with the establishment of the Grand Junction Plaza (GJP) and the expansion of Jersey Street. It was also the general consensus of the participants that there was really nothing of real Historical value on the south side of SR 32.

**Summary:** What is currently taking place in the redevelopment of Downtown is right on target with the Comprehensive Land Use Plan adopted in 2007, and updated with the 2013 Addendum for Grand Junction.

Unless the City can continue to work with INDOT to upgrade the traffic flow on SR 32, there is a risk that the wonderful amenity of Grand Junction will not be successful. That would be a shameful result, caused by a few naysayers who don’t want anything to change and have absolutely no vision of how Westfield can grow, yet maintain the small-town feel. The plans that are in place accomplish that and are working perfectly to achieve the vision for Westfield.

The residents are looking forward to relief from the poor traffic flow we currently have to deal with. It is untenable to leave the road structure in place as it is today. It will only grow worse in the future. It

will choke Westfield's downtown if the necessary improvements are not made to improve traffic flow. The recommended plan that is front of us at this time, will help solve the traffic flow issues. We need to move forward with that plan.

The results will be fantastic and will make all Westfield residents proud of the results.

Respectfully Submitted,

Joe Plankis

Westfield Economic Development Director

(Retired)



**Everhart, Sarah**

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**From:** rcb1640@aol.com  
**Sent:** Tuesday, January 19, 2021 6:43 PM  
**To:** Everhart, Sarah; meljones@calldcarpenter.com  
**Subject:** Downtown Westfield

Ms. Sara,

My name is Robert (Bob) Beauchamp, CEO of Grand Junction Properties, LLC. For the past 8 years I have been buying and restoring properties around the Grand Junction Plaza, several restaurants and a couple of specialty shops and I have leased my largest building to the YMCA for a studio. My wife Michelle and I now have several properties in or near the downtown. The reason we have invested in the area is evident, we can see the potential for growth around the Grand Junction Plaza. Our hope is that the Park Street and Jersey Street shops will cause a organic growth around the Plaza by providing a base of retail. This will hopefully be followed by new construction to replace decrepit buildings and to create a fabulous downtown, that coupled with the Plaza, will be a showplace for Westfield.

Cheers,

Bob 317-445-8275

## Everhart, Sarah

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**From:** Ken Kingshill <kenkingshill@gmail.com>  
**Sent:** Tuesday, January 19, 2021 11:21 PM  
**To:** Everhart, Sarah  
**Subject:** Westfield Main Street Project

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Sarah:

My name is Ken Kingshill. I am writing to you in support of the Westfield Main Street project as conceptualized by American Structure Point.

I am a former Westfield City Council President. I currently am a member of the Westfield Board of Zoning Appeals. I was a founding member of the Grand Junction Task Group (GJTG) and was co-chair of that group for its first 7 years. I am also a former Executive Director of the Downtown Westfield Association.

The GJTG is a citizen group that spent hundreds of hours over many years debating and considering the future and development of Downtown Westfield. One of the core topics we discussed and eventually reached consensus about was the design of Main Street through downtown. The GJTG welcomed input from anyone that cared to join us. In fact, we welcomed into our discussions many of the same people who now oppose the current plan.

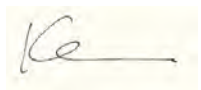
I can tell you that the current plan is virtually identical to the design that the GJTG approved. The people who oppose it now had every opportunity to be heard along the way. Some chose to take that opportunity, others chose not to.

Please do not let a small minority of people derail a project that is sorely needed for Westfield. I fully endorse the plan as currently proposed.

Thank you,

Ken Kingshill

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**Everhart, Sarah**

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**From:** Steve Hoover <stevehoover1@gmail.com>  
**Sent:** Tuesday, January 19, 2021 7:54 PM  
**To:** Everhart, Sarah  
**Subject:** Westfield Main St - SR 32

As a 22 year resident, 13 year Grand Junction task group member and a 12 year City Council member, I fully support the 32 expansion as proposed by American Structure Point. This plan is similar to what GJTG envisioned over 10 years ago and has been heavily supported by the majority of Westfield residents. Downtown businesses will continue to struggle without this major traffic improvement. The GJTG was created to save our downtown from further decline. The Downtown struggled in the late 1900's and early 2000's. If this expansion does not happen, I fear that further decline may ultimately cause the loss of the very buildings the Westfield Preservation Alliance are trying to save. It has always been thought that the most historic building are on the north side of 32 and the plan goes to great lengths to preserve those.

Thank you for your time,  
Steve Hoover

Sent from my iPad





AMERICAN  
**STRUCTUREPOINT**  
INC.

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www.structurepoint.com

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## C O M M E N T F O R M

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Please provide your comments, concerns, and/or suggestions regarding the proposed State Road 32 Westfield Reconstruction project in Westfield, Hamilton County, Indiana. Your comments are important to us, and we sincerely appreciate your time and participation during the public involvement process. Comments may be mailed, faxed, or submitted via e-mail to the address/fax number below.

Sarah Everhart  
American Structurepoint, Inc.  
9025 River Road, Suite 200  
Indianapolis, Indiana 46240  
Email: [severhart@structurepoint.com](mailto:severhart@structurepoint.com)  
Fax: (317) 543-0270

**Meeting Date:** August 22, 2019

**Project:** State Road 32 Westfield Reconstruction project in Westfield, Hamilton County, Indiana

**Des. No.:** 1801731

Name (Please Print):

Randell Graham

Address:

770 Maple Ln Westfield

Comments:

The only option that makes sense to me is  
Alt. A.

Signature:

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(Attach additional sheets, if necessary)



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## COMMENT FORM

Please provide your comments, concerns, and/or suggestions regarding the proposed State Road 32 Westfield Reconstruction project in Westfield, Hamilton County, Indiana. Your comments are important to us, and we sincerely appreciate your time and participation during the public involvement process. Comments may be mailed, faxed, or submitted via e-mail to the address/fax number below.

Sarah Everhart  
American Structurepoint, Inc.  
9025 River Road, Suite 200  
Indianapolis, Indiana 46240  
Email: [severhart@structurepoint.com](mailto:severhart@structurepoint.com)  
Fax: (317) 543-0270

**Meeting Date:** August 22, 2019

**Project:** State Road 32 Westfield Reconstruction project in Westfield, Hamilton County, Indiana

**Des. No.:** 1801731

**Name (Please Print):** DIANNE CLAYTON

**Address:** 135 Penn Street Westfield, IN 46074

**Comments:** Keeping 32 as a highway corridor is logical to be wider. Currently, commercial properties are on both sides. The commercial properties on south side of 32 have minimal historic classic architecture - widen on south side of 32.

Penn is a residential street with the historical city hall. Bad choice.

Jersey has many water issues and will front Grand Junction Park. No highway should border a park. Bad choice.

**Signature:** Dianne K Clayton

(Attach additional sheets, if necessary)

**From:** [Keith Horner](#)  
**To:** [Everhart, Sarah](#)  
**Cc:** [hornerk@wws.k12.in.us](mailto:hornerk@wws.k12.in.us)  
**Subject:** Where to get more info on St Rd 32 Design Options?  
**Date:** Sunday, September 01, 2019 9:22:49 AM

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Hi Sarah,

Warm Greetings.

I was unable to attend the info meeting on Aug 22<sup>nd</sup>, but would like to view more info on the proposals. Where / How might I do so?? Specifically, within the three proposals, I'd like to understand if / where traffic lights would remain as well as the use of roundabouts and/or under/over passes.

In general, I think the US 31, Keystone avenue thru Carmel, the St. Rd. 37 work in Fishers and similar projects..... serve as great models of effective traffic flow. I "vote" for long-term vision and designs that would maintain non-stop flow of traffic. Yes, the costs will be enormous, but I encourage long-term thinking for the East-West corridor in Hamilton County.....and anywhere North of I-70. Right now, there's no easy way to go East and West in the Northern half of Indiana!! Indiana 32 from the Boone County / Hamilton County line.....to the East side of Hamilton County.....can take upwards of an hour to go roughly 20 miles.

I drive a school bus for Westfield Washington Schools, and I'm on 32 in the design area multiple times per day. The amount of time we all sit at a dead-stop on 32 is.....A LOT.....and the current designs I see don't seem to go far enough to solve this really big problem.

Many thanks,

Keith Horner  
317-260-9156  
[Khornerhome7@hotmail.com](mailto:Khornerhome7@hotmail.com)



**From:** [Paul Kramarz](#)  
**To:** [Everhart, Sarah](#)  
**Subject:** SR32 Project Feedback  
**Date:** Sunday, August 25, 2019 5:06:55 PM

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Hi Sarah,

I attended the presentation on SR32 widening last week, and you had asked for community feedback so here is mine.

My name is Paul Kramarz, and I own the triplex at 102 Hillcrest Dr- if I read the materials correctly, the property would only be subject to seizure impact if the first option (widening the existing roadway) is chosen. However, under the other two options, tenants would only be able to exit the property in one direction, which could add to travel times.

As such, I think my first choice would be to widen the existing roadway. However, I do have some concerns regarding drainage. The current drainage seems to be inadequate, as the property lies in a lower area at the bottom of the hill. During heavy rainstorms, water pools next to SR32 and begins to back up towards the house. If the roadway would be widened, the drain area would push closer to the house and potentially create the risk of flooding the property. I guess I would be interested in what kind of drainage redesign would be accompanying the roadway widening, as I do not believe the current set up of storm drains adequately drain the water.

Thank you for the opportunity to provide input.

Sincerely,

Paul Kramarz  
626-353-6662

WEINTRAUT & ASSOCIATES, INC.

**ATTACHMENT G. Commitments**

## Commitments

- **Historic Preservation Commission and Advisory Committee:** The City of Westfield shall explore the creation of a preservation commission and the administrative processes through which such a committee may be established and empowered. As part of its efforts, the City of Westfield will consult with Indiana Landmarks and other local groups with a demonstrated interest in historic preservation regarding the creation and operation of such a commission. The City shall present a plan for the proposed preservation commission to the City Council for consideration and possible adoption through the appropriate administrative processes.
- **SR 32 Westfield Reconstruction Historic Preservation Advisory Committee:** As soon as practical, INDOT/City of Westfield and/or its representatives shall convene a SR 32 Westfield Reconstruction Historic Preservation Advisory Committee (“Advisory Team”). The Advisory Team’s primary duty shall be to review and comment upon INDOT/City of Westfield’s and/or its representative’s proposed Mitigation Items for Advisory Team Review (as identified below in Commitment II.C.), which will identify ways to mitigate effects to the Westfield Historic District from this undertaking. Additionally, the Advisory Team shall have other duties as defined within the Mitigation Items.
  - INDOT/City of Westfield and/or its representatives shall invite organizations with an established geographic connection to or specific interest in the City of Westfield and/or the Westfield Historic District, or with special expertise pertaining to the design or history of the area to participate on the Advisory Team.
  - The following organizations shall receive an invitation to participate in the Advisory Team if they so choose: the Division of Historic Preservation and Archaeology (DHPA), Indiana Landmarks, Hamilton County Highway Department, City of Westfield Community Development Department, City of Westfield Parks and Recreation Department, City of Westfield Public Works Department, City of Westfield Chamber of Commerce, Westfield Preservation Alliance, Westfield Washington Historical Society, affected property owners who have served as consulting parties/interested parties.
  - The Advisory Team will be chaired by a representative from INDOT/City of Westfield or by a consultant operating on their behalf. Advisory Team members will have the opportunity to participate via teleconference upon request.
  - INDOT/City of Westfield and/or its representatives will provide the information regarding the mitigation items, including construction details and other materials related to this undertaking, to the Advisory Team for review at least fifteen (15) days prior to a scheduled meeting.
  - The Advisory Team shall provide comments and/or make specific recommendations on the mitigation items submitted for consideration by



INDOT/City of Westfield. Meeting summaries will be distributed to all Advisory Team members by INDOT/City of Westfield following each meeting. The Advisory Team members will have fifteen (15) days to review and comment on the mitigation items and other materials, including the meeting summary.

- The Advisory Team Chair will be responsible for convening additional meetings of the Advisory Team as warranted by project changes or alterations of the planned mitigation items, for preparing and maintaining a summary of meetings, for distributing the meeting summary to Advisory Team members and other consulting parties, and for developing recommendations and submitting them to INDOT/City of Westfield for consideration and action.
- INDOT/City of Westfield and/or its representatives shall be responsible for providing a summary of the final mitigation items to members of the Advisory Team and the Division of Historic Preservation and Archaeology (“DHPA”) for their records. If the Advisory Team does not respond within thirty (30) days, acceptance will be assumed. If the Advisory Team responds with recommendations, a good faith effort to accommodate the recommendations will be made. INDOT/City of Westfield shall respond to the Advisory Team’s comments and include for their records information about any changes that resulted from their comments.
- INDOT/City of Westfield shall have the authority for final approval of actions recommended by the Advisory Team regarding the implementation of measures to avoid, minimize, or mitigate effects to the Westfield Historic District. The Advisory Team serves as in an advisory capacity to provide comment/input/feedback-to help guide mitigation items; the final decision-making authority resides with INDOT/Westfield.
- **Photo Documentation:** INDOT/City of Westfield and/or its representatives shall ensure that the structures and streetscapes within the Westfield Historic District that are located in the project area shall be photo-documented, prior to the initiation of any activities that could affect the Westfield Historic District.
  - INDOT/City of Westfield and/or its representatives shall ensure that this photo-documentation shall be prepared by a qualified professional in accordance with the Indiana Department of Natural Resources — Division of Historic Preservation and Archaeology Minimum Architectural Documentation Standards.
  - INDOT/City of Westfield and/or its representative shall submit digital images and any required photograph logs, supporting documentation, or available historic photographs of the structures and streetscapes within the Westfield Historic District to the DHPA for review and comment. The DHPA will have thirty (30) days to review and comment on the photographic documentation and related materials. If the DHPA does not respond to this submission within

thirty (30) days, acceptance will be assumed. If the DHPA responds with recommendations, a good faith effort to accommodate the recommendations will be made. INDOT/City of Westfield and/or its representatives will inform the DHPA of its response to such recommendations and submit any revisions for their review.

- INDOT/City of Westfield and/or its representatives shall provide a final copy of the photographic documentation to the DHPA for transmittal to the Indiana State Archives, and a copy to at least one local repository (local historical organization, library, or local government agency) that is willing to accept the documentation and make them available indefinitely for research.
- **Westfield Historic District National Register of Historic Places Nomination:** If, due to changes caused by this undertaking, the DHPA determines that the existing Westfield Historic District would no longer be eligible for listing in the National Register of Historic Places (National Register) with its current boundaries, [INDOT/City of Westfield] shall fund the preparation of a revised National Register nomination application nominating portions of the existing Westfield Historic District and other contiguous areas of the City that [INDOT/City of Westfield] and the DHPA believe qualify for listing in the National Register and that match the themes of the original nomination.
  - INDOT/City of Westfield shall ensure that the NRHP nomination application is completed. If the NRHP nomination application preparation is not undertaken directly by INDOT/City of Westfield, INDOT/City of Westfield shall provide funding to a Qualified Professional consultant for activities performed in preparation of the application. INDOT/City of Westfield and/or its consultant shall prepare and submit the first draft of the application to the DHPA within two years of the project's construction letting.
  - The qualified professional shall contact the National Register Survey and Registration staff at the DHPA prior to beginning work on the National Register nomination application to discuss the National Register process and expectations for completion of the application and to verify the National Register eligibility and boundaries of the property.
  - Prior to preparing the National Register nomination application to the DHPA, INDOT/City of Westfield shall publicize and hold a public meeting for the purpose of informing property owners and residents of the proposed district and other interested persons about the National Register and application process.
  - Photographs of the district that are required to be included in the NRHP nomination application shall be taken by the qualified professional preceding the submission of the application to the DHPA, and all such photographs shall be taken either before the commencement of construction of this project or after the completion of this project.
  - INDOT/City of Westfield and/or its consultant shall be responsible for revising the National Register nomination application to address revisions

requested by DHPA, the Indiana Historic Preservation Review Board, and/or the National Park Service (“NPS”).

- INDOT/City of Westfield's obligation to prepare the National Register nomination application shall be considered satisfied when the DHPA notifies INDOT/City of Westfield and/or its consultant that the application is complete and has been accepted by the NPS.
- Per NPS guidelines, if a majority of property owners of the Westfield Historic District object to the revision of the Westfield Historic District and the new National Register nomination application, INDOT/City of Westfield's commitment to fund or produce this nomination application will be deemed complete.

- **Mitigation Items for Advisory Team Review:**

- *Removal/relocation of the historic structure located at 102 S Union Street (“Erika’s Place”).* As a primary mitigation action, if it is deemed practical and feasible, INDOT/City of Westfield shall relocate and rehabilitate the historic structure located at 102 S Union Street (“Erika’s Place”) that would otherwise be demolished by the undertaking, to be permanently re-erected elsewhere in the current or proposed boundaries of the Westfield Historic District in the City of Westfield, Hamilton County, Indiana.
  - In the event that INDOT/City of Westfield and/or its representatives determine that it is not practical or feasible to move the 102 S Union Street (“Erika’s Place”) structure, INDOT/City of Westfield will notify the Advisory Team and interested parties in writing of their decision and their reasoning for that determination, as soon as practicable.
  - In the event that INDOT/City of Westfield and/or its representatives determine that it is practical and feasible to move the 102 S Union Street structure, INDOT/City of Westfield shall submit the relocation plans for the structure to the Advisory Team for review and comment. If the Advisory Team does not respond within thirty (30) days, acceptance will be assumed. If the Advisory Team responds with recommendations, a good faith effort to accommodate the recommendations will be made. INDOT/City of Westfield shall respond to the Advisory Team’s comments and include for their records information about any changes that resulted from their comments.
- *Removal of 102 S Union Street (“Erika’s Place”) - Mitigation Fund*
  - If, however, INDOT/City of Westfield determines that the relocation and rehabilitation of the 102 S Union Street (“Erika’s Place”) structure is not a prudent or feasible mitigation action, INDOT/City of Westfield will create a fund (“Mitigation Fund”) to be utilized for initiatives or programs that focus upon the community of Westfield and on themes related to the Westfield Historic District, including Architecture, Commerce, Community Planning and Development, Quaker Heritage, and/or the Underground Railroad.
    - That fund will be commensurate with the total funds that were available for the planned relocation and rehabilitation of the 102 S Union Street (“Erika’s Place”) structure. This fund shall be utilized to reimburse a



not-for-profit or local government entity for activities associated with the implementation or execution of the initiatives or programs relating to the themes identified in Commitment II.C.1.b. and approved by INDOT/City of Westfield and/or its representatives.

- INDOT/City of Westfield and/or its representatives, with the consultation of the Advisory Team, will develop minimum qualifications for initiatives and projects seeking to access reimbursement from the Mitigation Fund and set forth a process for third parties to prepare and submit proposals for funding initiatives.
- Within one (1) calendar year of approval of the Certificate of Approval (COA) by the State Review Board for this project, the Advisory Team shall review and select initiatives from the pool of qualified proposals to recommend for funding from the Mitigation Fund. These proposals will be submitted to INDOT/City of Westfield and DHPA for final approval.
- If INDOT/City of Westfield or DHPA provides written comments on a qualified proposal, the applicant shall have sixty (60) days to revise to the proposal in response to the comments.
- Reimbursement from the fund shall be implemented through December 31, 2026; recipients of the fund shall provide an annual progress report to INDOT/City of Westfield and DHPA. The initiatives funded through the Mitigation Fund must be completed, provided to the public, and all funds expended within five (5) years of the signing of the COA.
- If a proposal is not received within (1) calendar year of the signing of the COA then INDOT/City of Westfield's obligations under this commitment shall be concluded.
- *Context Sensitive Design Solutions:* As a part of this project, INDOT/City of Westfield shall explore context sensitive design solutions that will enhance the areas in and around the Westfield Historic District that fall within the project Area of Potential Effect (APE).
  - As a part of this project, INDOT/City of Westfield shall face the concrete retaining wall located adjacent to the Stultz-Stanley House with brick to better blend into the historical property's setting. INDOT/City of Westfield shall submit the design for the retaining wall brick cladding to the Advisory Team for review and comment.
  - As a part of this project, INDOT/City of Westfield shall rehabilitate and install the centennial bell within the planned roundabout to be constructed as part of this undertaking. INDOT/City of Westfield shall submit the design and construction details for the installation of the bell and its housing to the Advisory Team for review and comment. If the centennial bell is not located or it is not feasible to install it at this location, other context sensitive options for the roundabout will be explored. If the

Advisory Team does not respond within thirty (30) days, acceptance will be assumed. If the Advisory Team responds with recommendations, a good faith effort to accommodate the recommendations will be made. INDOT/City of Westfield shall respond to the Advisory Team's comments and include for their records information about any changes that resulted from their comments.

- *Interpretative Signage:* As a part of this project, INDOT/City of Westfield shall fund the manufacture and the installation of signage or plaques at the boundaries of the Westfield Historic District that identify the district. INDOT/City of Westfield or its representatives shall submit the design and graphic content of the signs or plaques to the Advisory Team for review and comment. If the Advisory Team does not respond within thirty (30) days, acceptance will be assumed. If the Advisory Team responds with recommendations, a good faith effort to accommodate the recommendations will be made. Content, graphic design, and final design plans for the signs or plaques will be provided to the Advisory Team for their records.